UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:
DE-9J

April 4, 2006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chad Erdmann
Manager, Energy & Environmental Engineering
Keystone Steel & Wire Company
7000 S.W. Adams Street
Peoria, Illinois 61641-0002

Re: Corrective Measures Implementation Workplan
Keystone Steel & Wire Company
EPA ID No. ILD 000 714 881

Dear Mr. Perry:

The United States Environmental Protection Agency (U.S. EPA) has completed the review of the March 2006 Revised Corrective Measures Implementation Work Plan (CMI WP) for the Keystone Steel and Wire (KS&W) facility in Peoria, Illinois. We have also reviewed the facility's March 8, 2006 letter presenting associated responses to EPA comments and detailing revisions made to the November 2005 version of the CMI WP. Items remaining to be addressed are outlined below. All other issues have been satisfactorily resolved. KS&W must revise the CMI workplan to address all of the comments in this attachment within 15 days of receipt of this letter and submit to U.S. EPA for review and approval.

If you have any questions regarding this matter, please contact Jonathan Adenuga at (312) 886-7954.

Sincerely,

Jonathan Adenuga
Waste Pesticides and Toxics Division

Enclosure

ATTACHMENT

1. Comment 9: ENTACT has appropriately incorporated U.S. EPA's well installation and groundwater monitoring recommendations into Sections 3.2.9 and 3.3.8 of the CMI WP. Accordingly, the first sentence in each section should eliminate reference to these monitoring efforts as a "one-time" groundwater monitoring program.

2. Comments 10 and 25: Although ENTACT's response letter indicates that Section 4.1.2 of the CMI WP and appropriate sections of the Quality Assurance Project Plan (QAPP) have been updated to reflect U.S. EPA's comment, no such changes appear to have been made. ENTACT should ensure that content requirements for the quarterly progress reports are appropriately amended, as requested.

3. Comment 27: In their response, ENTACT has clarified that analytical data obtained during the investigation will not be formally validated. Instead, ENTACT indicates that they will conduct a cursory review of the primary QC elements. However there is no specific, specified corrective action for items that are out of control. Given that these data will be used to document successful achievement of corrective action objectives, we recommend that at least a representative portion of the data be formally validated in accordance with U.S. EPA's guidance. The CMI WP should be revised accordingly.

4. Comment 28: Tables 1 and 2 still need to be updated to reference SW-846 test method 8260B for volatile organic compound analyses.

Keystone Consolidated Industries, Inc.
7000 S.W. Adams Street
Peoria, IL 61641
(309) 697-7702

David L. Cheek
President and Chief Executive Officer

February 27, 2006

CERTIFIED MAIL # 7004 2510 0002 6415 7367
RETURN RECEIPT REQUESTED

Mr. Jonathan Adenuga
Enforcement and Compliance Assurance
Waste, Pesticides, and Toxics Division
U.S. Environmental Protection Agency, Region 5 (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: Financial Assurance Demonstration
Keystone Steel & Wire Company
EPA ID No: ILD 000 714 881

Dear Mr. Adenuga:

We would like to thank you and Mr. Hamper for discussing our corrective action financial assurance options with Keystone Steel & Wire Co. (Keystone) during the conference call on February 14, 2006. Moreover, we appreciate your understanding of our situation and your receptivity and support for what we believe to be a reasonable yet effective approach. Based upon the discussions during the conference call, the USEPA and Keystone agreed upon a solution to the financial assurance issue for the corrective action activities at the Peoria Plant.

As requested in your letter dated February 16, 2006, (received February 22) Keystone is submitting herewith the documentation from ENTACT Services for the corrective action activities completed at the North Ditch Staging Area as of February 14, 2006.

By April 21, 2006, Keystone will submit to you documentation for the completion of the remaining corrective action activities at the North Ditch Staging Area and F-Pond. Keystone will also provide a copy of all invoices for services paid to ENTACT.

Should you have any questions or need additional information please do not hesitate to call me at 309/697-7702.

Respectfully,

David L. Cheek
President and Chief Executive Officer

Attachment
cc: George Hamper, USEPA (less attachment)
Andrew Running, Kirkland & Ellis
Pierce Marshall, on behalf of Keystone Steel & Wire Co.
Kevin Lombardozzi, on behalf of Keystone Steel & Wire Co.
Bert Downing, Keystone Steel & Wire Co. (less attachment)
Chad Erdmann, Keystone Steel & Wire Co.
Thad Slaughter, ENTACT (less attachment)

CERTIFICATION STATEMENT FOR CORRECTIVE MEASURES IMPLEMENTATION REPORT NO. 1 Keystone Steel & Wire Company Peoria, Illinois

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

ILD000714881
U.S. EPA ID Number

Keystone Steel & Wire Company
Facility Name

2-29-06

Signature of Owner/Operator Date
Responsible Officer

David L. Cheek, President & CEO
Name and Title of Owner/Officer
Responsible Officer

CORRECTIVE MEASURES
STATUS REPORT NO. 1

for the

NORTH DITCH STAGING AREA AND F-POND
RCRA CORRECTIVE MEASURES
AS OF FEBRUARY 14, 2006

at the

KEYSTONE STEEL & WIRE COMPANY
7000 SW ADAMS STREET
PEORIA, ILLINOIS 61641

FEBRUARY 27, 2006

TABLE OF CONTENTS

Section **Page**

List of Tables

List of Figures

List of Attachments

1.0 INTRODUCTION

This Corrective Measures Implementation Report No. 1 has been prepared by ENTACT Services LLC (ENTACT) on behalf of the Keystone Steel and Wire Company (Keystone) for the RCRA corrective action activities associated with the F-Pond and North Ditch Staging Area at Keystone's facility located in Peoria, Illinois. This Corrective Measures Implementation Report No. 1 has been developed, at the request of the U.S. Environmental Protection Agency (EPA), to describe the work performed at the F-Pond and North Ditch Staging Area through February 14, 2006.

1.1 Background

The corrective measures activities associated with the Keystone facility are being performed pursuant to the *Corrective Measures Implementation (CMI) Workplan* dated November 4, 2005 and subsequent revisions. This CMI Workplan was developed to describe the operational components of the selected corrective measures for the F-Pond and North Ditch Staging Area, as described in the Statement of Basis dated October 14, 2005, in order to fulfill the requirements of the Administrative Order on Consent between the U.S. EPA and Keystone.

1.2 Corrective Measures Components

The selected corrective measures for the F-Pond and North Ditch Staging Area address lead and iron contamination, as appropriate, in the sediment/soil. The major components of the selected corrective measures include the following:

North Ditch Staging Area

- Identification of characteristically hazardous soils;
- In-situ treatment of characteristically hazardous soils, if present, to render the soils non-hazardous, when generated;
- Excavation of the treated and impacted soils to achieve the remediation goals;
- Off-site disposal of the excavated soils as non-hazardous waste at a Subtitle D disposal facility;
- Deed restriction on the North Ditch Staging Area to limit future use of the unit to commercial/industrial purposes; and
- Implementation of groundwater sampling to demonstrate no impact to the underlying groundwater.

F-Pond

- Dewatering of the F-Pond;
- Identification of characteristically hazardous soils/sediments;

- In-situ treatment of characteristically hazardous soils/sediments, if present, to render the soils/sediments non-hazardous, when generated;
- Excavation of the treated and impacted soils/sediments to achieve the remediation goals;
- Off-site disposal of the excavated soils/sediments as non-hazardous waste at a Subtitle D disposal facility;
- Deed restriction on the F-Pond to limit future use of the unit to commercial/industrial purposes; and
- Implementation of groundwater sampling to demonstrate no impact to the underlying groundwater.

This report will summarize the above-mentioned activities performed by ENTACT through February 14, 2006 and will include any analytical data, a summary of excavation and disposal activities, and other supporting documentation required to verify such performance.

2.0 SUMMARY OF CORRECTIVE MEASURES IMPLEMENTATION THROUGH FEBRUARY 14, 2006

This Corrective Measures Implementation Report No. 1 has been developed at the U.S. EPA's request to describe the work performed at the North Ditch Staging Area and F-Pond through February 14, 2006. The following sections further describe the activities conducted by ENTACT during this timeframe.

2.1 North Ditch Staging Area

The corrective measures at the North Ditch Staging Area were implemented in November 2005 and continue through February 2006.

2.1.1 Identification of Characteristically Hazardous Soils

In November 2005, the limits of the North Ditch Staging Area, including the sampling locations from the December 2002 sampling event, were identified by a licensed surveyor based on the data provided in the *Final Corrective Measures Proposal* dated January 2003. A 50-ft by 50-ft coordinate grid system was established in the surveyed areas as described in the *CMI Workplan* dated November 4, 2005 and subsequent revisions.

Soil samples from the locations in the North Ditch Staging Area where samples were previously collected in December 2002 (see Figure 2 of the *Field Sampling Plan*, included as Appendix B to the *CMI Workplan*) were collected to determine if the soil exhibited the toxicity characteristic for lead (>5 mg/l TCLP). Grab samples were collected from each of the December 2002 sampling locations at depths of approximately 1 to 2 feet below ground surface and were submitted to PDC Laboratories, Inc. for analysis of lead using the toxicity characteristic leaching procedure (TCLP).

2.1.2 In-situ Treatment

Based on the sampling results, in February 2006, the soils in the North Ditch Staging Area were treated in-situ with approximately 2% granular triple superphosphate (TSP) to a depth of approximately 2 feet below ground surface (bgs). The treated soil was then sampled in place, in volumes of approximately 300 cubic yards, for characterization purposes. A 4-part composite sample was collected from each 300 cubic yard volume and was submitted to PDC Laboratories, Inc. for analysis of TCLP lead. The results of the characterization sampling are presented in Table 1 and the laboratory analytical reports are included in Attachment 1.

Soils were not removed from the treatment area until the analytical results confirmed that the soil no longer exhibited the toxicity characteristic for lead and thus, would not be considered hazardous waste when generated.

2.1.3 Excavation

In February 2006, the in-situ treated soil was excavated using hydraulic excavators to a depth of approximately 2 feet below ground surface.

Post-excavation confirmation samples were then collected from the excavated surfaces of the grid to document that the soil which exhibited the toxicity characteristic for lead was treated and removed and that the remediation goal for the North Ditch Staging Area (800 mg/kg total lead) was achieved. One composite sample consisting of 4 parts was collected from the excavation bottom and sidewall of each grid, as depicted on Figure 1. The samples were then submitted to PDC Laboratories for analysis of total lead. Excavation bottom samples collected from grids B2, A3, A5, and A6, where soils initially exhibited the toxicity characteristic for lead, were also analyzed for TCLP lead.

The laboratory analytical results indicated that the post-excavation surface in most grids did not achieve the remediation goals for the North Ditch Staging Area. Therefore, in-situ treatment and excavation will continue until the remediation goals are achieved. This work has been initiated and will be reported in Corrective Measures Status Report No. 2.

The results of the interim post-excavation confirmation sampling are presented on Table 2 and the laboratory analytical reports are included in Attachment 1.

2.1.4 Load-out, Transportation and Off-site Disposal

In February 2006, upon the receipt of laboratory analytical results which indicated that the in-situ treated soil would be non-hazardous when generated, i.e. TCLP lead concentrations did not exceed 5 mg/l, the soils were excavated and direct loaded into tandem trucks for off-site transportation and disposal at the Tazwell RDF in East Peoria, Illinois. As of February 14, 2006, approximately 2,392.65 tons of soil from the North Ditch Staging Area was disposed as non-hazardous special waste at this facility. A summary of the waste disposal information is provided in Table 3. Additional soil will be sent off-site for disposal based on additional excavation required to meet the remediation goals.

2.2 F-Pond

No corrective measure activities have been conducted at the F-Pond through February 14, 2006.

2.3 Other Documentation

2.3.1 Photos

Photos of the corrective measures activities conducted at the North Ditch Staging Area are included in Attachment 2.

2.3.2 Daily Work Reports

Daily work reports which detail the activities conducted during North Ditch Staging Area corrective measure are included in Attachment 3.

2.3.3 Invoiced and Paid Work

Based on ENTACT's contract with Keystone, ENTACT cannot invoice for the North Ditch Staging Area or F-Pond corrective measures until each unit is completed. Therefore, no invoices have been submitted or paid to date. ENTACT anticipates the completion of the North Ditch Staging Area corrective measure by mid-March 2006 and the F-Pond corrective measure by the end of April 2006.

Based on the letter to Keystone dated February 16, 2006, from J. Adenuga of the USEPA confirming the agreement reached during a phone conference about the project, Keystone will be required to prepay ENTACT for all remaining corrective action work unbilled and not completed by April 21, 2006, in order to demonstrate financial assurance. Documentation of invoiced and paid work will be submitted in the Corrective Measures Status Report No. 2.

TABLE 1: CHARACTERIZATION SAMPLE ANALYTICAL RESULTS
KEYSTONE STEEL & WIRE COMPANY
PEORIA, ILLINOIS

Sample Date	Unit Name	Sample ID No.	Sample Description	Sample Location	Sample Depth (feet)	Laboratory Report No.	TCLP Lead (mg/l)
Criteria							**5**
11/23/05	North Ditch Staging Area	CS-ND-2-001	Characterization of hot spot	ND-2 sample location	1	PDC 5113698	1.04
11/23/05	North Ditch Staging Area	CS-ND-3-001	Characterization of hot spot	ND-3 sample location	1.5	PDC 5113698	0.82
11/23/05	North Ditch Staging Area	CS-ND-4-001	Characterization of hot spot	ND-4 sample location	1	PDC 5113698	4
01/25/06	North Ditch Staging Area	CS-ND-SP1-001	Post in-situ treatment	Area 1		PDC 6013543	0.0061
01/25/06	North Ditch Staging Area	CS-ND-SP2-001	Post in-situ treatment	Area 2		PDC 6013543	0.24
01/25/06	North Ditch Staging Area	CS-ND-SP3-001	Post in-situ treatment	Area 3		PDC 6013543	0.043
01/25/06	North Ditch Staging Area	CS-ND-SP4-001	Post in-situ treatment	Area 4		PDC 6013543	0.016

TABLE 2: POST-EXCAVATION CONFIRMATION SAMPLE ANALYTICAL RESULTS
KEYSTONE STEEL & WIRE COMPANY
PEORIA, ILLINOIS

Sample Date	Unit Name	Sample ID No.	Sample Type	Sample Location	Sample Depth (ft)	Laboratory Report No.	Total Lead (mg/kg)	TCLP Metals (mg/l)
							Lead	Lead
Remediation Goal							**800**	**5**
02/03/06	NDSA	ECS-ND-A6-SWS-001	Grab	Grid A6, South sidewall	2	PDC 6021467	**880**	
02/03/06	NDSA	ECS-ND-A6-001	Grab	Grid A6, Bottom	2	PDC 6021467	170	
02/03/06	NDSA	ECS-ND-A6(X)-001	Grab	Grid A6, Bottom Duplicate	2	PDC 6021467	**3300**	
02/03/06	NDSA	ECS-ND-A6-SWE-001	Grab	Grid A6, East sidewall	2	PDC 6021467	**4000**	
02/03/06	NDSA	ECS-ND-A6-SWW-001	Grab	Grid A6, West sidewall	2	PDC 6021467	670	
02/03/06	NDSA	ECS-ND-A6-ND4-001	Grab	Grid A6, ND-4 sample location	2	PDC 6021467	**2400**	< 0.038
02/03/06	NDSA	ECS-ND-A5-001	Grab	Grid A5, Bottom	2	PDC 6021467	**16000**	
02/03/06	NDSA	ECS-ND-A5-SWW-001	Grab	Grid A5, West sidewall	2	PDC 6021467	200	
02/03/06	NDSA	ECS-ND-A5-SWE-001	Grab	Grid A5, East sidewall	2	PDC 6021467	**3800**	
02/03/06	NDSA	ECS-ND-A5-ND3-001	Grab	Grid A5, ND-3 sample location	2	PDC 6021467	**2700**	< 0.065
02/03/06	NDSA	ECS-ND-A2-SWW-001	Grab	Grid A2, West sidewall	2	PDC 6021467	71	
02/03/06	NDSA	ECS-ND-B4-SWS-001	Grab	Grid B4, South sidewall	2	PDC 6021467	**9100**	
02/03/06	NDSA	ECS-ND-A5-SWN-001	Grab	Grid A5, North sidewall	2	PDC 6021467	260	
02/03/06	NDSA	ECS-ND-A3-SWW-001	Grab	Grid A3, West sidewall	2	PDC 6021467	**1200**	
02/03/06	NDSA	ECS-ND-B3-SWE-001	Grab	Grid B3, East sidewall	2	PDC 6021467	**23000**	
02/03/06	NDSA	ECS-ND-A3-001	Grab	Grid A3, Bottom	2	PDC 6021467	**33000**	
02/03/06	NDSA	ECS-ND-A3(X)-001	Grab	Grid A3, Bottom Duplicate	2	PDC 6021467	93	
02/03/06	NDSA	ECS-ND-B3-001	Grab	Grid B3, Bottom	2	PDC 6021467	**17000**	
02/03/06	NDSA	ECS-ND-B2-SWE-001	Grab	Grid B2, East sidewall	2	PDC 6021467	**920**	
02/03/06	NDSA	ECS-ND-A2-SWN-001	Grab	Grid A2, North sidewall	2	PDC 6021467	76	
02/03/06	NDSA	ECS-ND-A3-ND2-001	Grab	Grid A3, ND-2 sample location	2	PDC 6021467	**1900**	0.05
02/03/06	NDSA	ECS-ND-B2-SWN-001	Grab	Grid B2, North sidewall	2	PDC 6021467	**1600**	
02/03/06	NDSA	ECS-ND-B2-BT-001	Grab	Grid B2, BT sample location	2	PDC 6021467	320	0.03

TABLE 3: WASTE DISPOSAL RECORD
KEYSTONE STEEL & WIRE COMPANY
PEORIA, ILLINOIS

Shipment Date	No. of Loads	Manifest No.	Unit Name	Ticket No.	Weight (tons)	Disposal Facility
01/30/06	1	11826501	North Ditch Staging Area	94798	27.48	Tazwell RDF
01/30/06	2	11826504	North Ditch Staging Area	94800	17.27	Tazwell RDF
01/30/06	3	11826502	North Ditch Staging Area	94802	23.72	Tazwell RDF
01/30/06	4	11826503	North Ditch Staging Area	94804	22.24	Tazwell RDF
01/30/06	5	11826505	North Ditch Staging Area	94805	19.56	Tazwell RDF
01/30/06	6	11826506	North Ditch Staging Area	94806	19.02	Tazwell RDF
01/30/06	7	11826507	North Ditch Staging Area	94807	17.96	Tazwell RDF
01/30/06	8	11826508	North Ditch Staging Area	94809	17.28	Tazwell RDF
01/30/06	9	11826509	North Ditch Staging Area	94810	18.54	Tazwell RDF
01/30/06	10	11826510	North Ditch Staging Area	94815	19.67	Tazwell RDF
01/30/06	11	11826511	North Ditch Staging Area	94816	19.67	Tazwell RDF
01/30/06	12	11826512	North Ditch Staging Area	94817	18.98	Tazwell RDF
01/30/06	13	11826513	North Ditch Staging Area	94819	20.33	Tazwell RDF
01/30/06	14	11826514	North Ditch Staging Area	94821	19.32	Tazwell RDF
01/30/06	15	11826515	North Ditch Staging Area	94822	19.63	Tazwell RDF
01/30/06	16	11826516	North Ditch Staging Area	94823	18.63	Tazwell RDF
01/30/06	17	11826517	North Ditch Staging Area	94824	18.86	Tazwell RDF
01/30/06	18	11826518	North Ditch Staging Area	94825	17.54	Tazwell RDF
01/30/06	19	11826519	North Ditch Staging Area	94832	20.08	Tazwell RDF
01/30/06	20	11826520	North Ditch Staging Area	94834	22.46	Tazwell RDF
01/30/06	21	11826521	North Ditch Staging Area	94837	21.86	Tazwell RDF
01/30/06	22	11826522	North Ditch Staging Area	94839	22.62	Tazwell RDF
01/30/06	23	11826523	North Ditch Staging Area	94841	20.63	Tazwell RDF
01/30/06	24	11826524	North Ditch Staging Area	94843	18.99	Tazwell RDF
01/30/06	25	11826525	North Ditch Staging Area	94844	19.79	Tazwell RDF
01/30/06	26	11826526	North Ditch Staging Area	94845	18.67	Tazwell RDF
01/30/06	27	11826527	North Ditch Staging Area	94851	22.15	Tazwell RDF
01/30/06	28	11826528	North Ditch Staging Area	94857	21.27	Tazwell RDF
01/30/06	29	11826529	North Ditch Staging Area	94860	21.03	Tazwell RDF
01/30/06	30	11826530	North Ditch Staging Area	94861	23.25	Tazwell RDF
01/30/06	31	11826531	North Ditch Staging Area	94862	20.2	Tazwell RDF
01/30/06	32	11826532	North Ditch Staging Area	94865	18.39	Tazwell RDF
01/30/06	33	11826533	North Ditch Staging Area	94870	19.76	Tazwell RDF
01/30/06	34	11826534	North Ditch Staging Area	94873	17.87	Tazwell RDF
01/30/06	35	11826535	North Ditch Staging Area	94885	17.77	Tazwell RDF
01/30/06	36	11826536	North Ditch Staging Area	94887	18.81	Tazwell RDF
01/30/06	37	11826537	North Ditch Staging Area	94886	18.06	Tazwell RDF
01/30/06	38	11826538	North Ditch Staging Area	94890	16.51	Tazwell RDF
01/30/06	39	11826539	North Ditch Staging Area	94891	19.12	Tazwell RDF
01/30/06	40	11826540	North Ditch Staging Area	94893	15.56	Tazwell RDF
01/30/06	41	11826541	North Ditch Staging Area	94894	19.76	Tazwell RDF
01/30/06	42	11826542	North Ditch Staging Area	94907	20.54	Tazwell RDF
01/30/06	43	11826543	North Ditch Staging Area	94909	22.57	Tazwell RDF
01/30/06	44	11826544	North Ditch Staging Area	94912	19.96	Tazwell RDF
01/30/06	45	11826545	North Ditch Staging Area	94913	21.76	Tazwell RDF
01/30/06	46	11825968	North Ditch Staging Area	94915	20.1	Tazwell RDF
01/30/06	47	11825970	North Ditch Staging Area	94916	20.86	Tazwell RDF
01/30/06	48	11825971	North Ditch Staging Area	94917	19.93	Tazwell RDF

TABLE 3: WASTE DISPOSAL RECORD
KEYSTONE STEEL & WIRE COMPANY
PEORIA, ILLINOIS

Shipment Date	No. of Loads	Manifest No.	Unit Name	Ticket No.	Weight (tons)	Disposal Facility
01/30/06	49	11825969	North Ditch Staging Area	128048	20.19	Tazwell RDF
01/30/06	50	11825972	North Ditch Staging Area	94926	18.92	Tazwell RDF
01/30/06	51	11825973	North Ditch Staging Area	94927	17.63	Tazwell RDF
01/30/06	52	11825974	North Ditch Staging Area	94928	18.35	Tazwell RDF
01/30/06	53	11825975	North Ditch Staging Area	94929	16.9	Tazwell RDF
01/30/06	54	11825976	North Ditch Staging Area	94930	18.18	Tazwell RDF
01/30/06	55	11825977	North Ditch Staging Area	94931	19.95	Tazwell RDF
01/30/06	56	11825978	North Ditch Staging Area	498951	16.76	Tazwell RDF
01/30/06	57	11825979	North Ditch Staging Area	498954	17.42	Tazwell RDF
01/31/06	58	11825980	North Ditch Staging Area	498965	18.63	Tazwell RDF
01/31/06	59	11825981	North Ditch Staging Area	498966	18.72	Tazwell RDF
01/31/06	60	11825982	North Ditch Staging Area	128052	16.15	Tazwell RDF
01/31/06	61	11825983	North Ditch Staging Area	128053	19.34	Tazwell RDF
01/31/06	62	11825984	North Ditch Staging Area	128054	16.08	Tazwell RDF
01/31/06	63	11825986	North Ditch Staging Area	128055	17.84	Tazwell RDF
01/31/06	64	11825985	North Ditch Staging Area	128056	17.51	Tazwell RDF
01/31/06	65	11825987	North Ditch Staging Area	94947	20.23	Tazwell RDF
01/31/06	66	11825988	North Ditch Staging Area	94948	19.87	Tazwell RDF
01/31/06	67	11825989	North Ditch Staging Area	94949	17.4	Tazwell RDF
01/31/06	68	11825990	North Ditch Staging Area	94950	19.63	Tazwell RDF
01/31/06	69	11825991	North Ditch Staging Area	94952	15.87	Tazwell RDF
01/31/06	70	11825992	North Ditch Staging Area	94954	19.42	Tazwell RDF
01/31/06	71	11825993	North Ditch Staging Area	498982	20.68	Tazwell RDF
01/31/06	72	11825995	North Ditch Staging Area	94961	19.56	Tazwell RDF
01/31/06	73	11825994	North Ditch Staging Area	94962	20.17	Tazwell RDF
01/31/06	74	11825996	North Ditch Staging Area	94963	21.39	Tazwell RDF
01/31/06	75	11825997	North Ditch Staging Area	94965	20.98	Tazwell RDF
01/31/06	76	11825998	North Ditch Staging Area	94966	23.1	Tazwell RDF
01/31/06	77	11825999	North Ditch Staging Area	94971	18.84	Tazwell RDF
01/31/06	78	11826547	North Ditch Staging Area	94973	18.78	Tazwell RDF
01/31/06	79	11826548	North Ditch Staging Area	499009	18.67	Tazwell RDF
01/31/06	80	11826549	North Ditch Staging Area	94977	18.83	Tazwell RDF
01/31/06	81	11826550	North Ditch Staging Area	94980	18.66	Tazwell RDF
01/31/06	82	11826551	North Ditch Staging Area	94981	20.66	Tazwell RDF
01/31/06	83	11826552	North Ditch Staging Area	94982	19.82	Tazwell RDF
01/31/06	84	11826546	North Ditch Staging Area	128064	18.43	Tazwell RDF
01/31/06	85	11826553	North Ditch Staging Area	94984	21.13	Tazwell RDF
01/31/06	86	11826544	North Ditch Staging Area	94988	22.24	Tazwell RDF
01/31/06	87	11826555	North Ditch Staging Area	94990	20.55	Tazwell RDF
01/31/06	88	11826556	North Ditch Staging Area	94991	20.12	Tazwell RDF
01/31/06	89	11826557	North Ditch Staging Area	94992	20.2	Tazwell RDF
01/31/06	90	11826558	North Ditch Staging Area	94993	18.17	Tazwell RDF
01/31/06	91	11826559	North Ditch Staging Area	94994	20.58	Tazwell RDF
01/31/06	92	11826560	North Ditch Staging Area	94996	19.31	Tazwell RDF
01/31/06	93	11826561	North Ditch Staging Area	95003	17.77	Tazwell RDF
01/31/06	94	11826562	North Ditch Staging Area	95006	20.27	Tazwell RDF
01/31/06	95	11826563	North Ditch Staging Area	95010	19.21	Tazwell RDF
01/31/06	96	11826564	North Ditch Staging Area	95012	20.42	Tazwell RDF

TABLE 3: WASTE DISPOSAL RECORD
KEYSTONE STEEL & WIRE COMPANY
PEORIA, ILLINOIS

Shipment Date	No. of Loads	Manifest No.	Unit Name	Ticket No.	Weight (tons)	Disposal Facility
01/31/06	97	11826565	North Ditch Staging Area	95013	18.33	Tazwell RDF
01/31/06	98	11826566	North Ditch Staging Area	95014	21.28	Tazwell RDF
01/31/06	99	11826567	North Ditch Staging Area	95016	18.45	Tazwell RDF
01/31/06	100	11826568	North Ditch Staging Area	95017	15.51	Tazwell RDF
01/31/06	101	11826569	North Ditch Staging Area	95026	21.8	Tazwell RDF
01/31/06	102	11826570	North Ditch Staging Area	95027	19.27	Tazwell RDF
01/31/06	103	11826571	North Ditch Staging Area	95028	19.09	Tazwell RDF
01/31/06	104	11826572	North Ditch Staging Area	95030	20.27	Tazwell RDF
01/31/06	105	11826573	North Ditch Staging Area	95031	19.85	Tazwell RDF
01/31/06	106	11826574	North Ditch Staging Area	95034	21.54	Tazwell RDF
01/31/06	107	11826575	North Ditch Staging Area	95037	19.66	Tazwell RDF
01/31/06	108	11826576	North Ditch Staging Area	95043	22.91	Tazwell RDF
01/31/06	109	11826577	North Ditch Staging Area	499080	20.85	Tazwell RDF
01/31/06	110	11826578	North Ditch Staging Area	95047	20.04	Tazwell RDF
01/31/06	111	11826579	North Ditch Staging Area	95050	21.01	Tazwell RDF
01/31/06	112	11826580	North Ditch Staging Area	95051	20.34	Tazwell RDF
01/31/06	113	11826581	North Ditch Staging Area	95052	19.69	Tazwell RDF
02/01/06	114	11826582	North Ditch Staging Area	499101	18.86	Tazwell RDF
02/01/06	115	11826583	North Ditch Staging Area	499103	17.8	Tazwell RDF
02/01/06	116	11826000	North Ditch Staging Area	499105	17.35	Tazwell RDF
02/01/06	117	8709206	North Ditch Staging Area	499106	20.25	Tazwell RDF
02/01/06	118	8709207	North Ditch Staging Area	499110	22.47	Tazwell RDF
02/01/06	119	8709209	North Ditch Staging Area	499115	20.51	Tazwell RDF
02/01/06	120	8709210	North Ditch Staging Area	499117	18.41	Tazwell RDF
02/01/06	121	8709208	North Ditch Staging Area	499123	20.13	Tazwell RDF
02/01/06	122	8709211	North Ditch Staging Area	499129	21.42	Tazwell RDF
Total					**2392.65**	

ATTACHMENT 1

LABORATORY ANALYTICAL REPORTS

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

ACCREDITED IN ACCORDANCE WITH nelac

Entact - Dallas Office
3129 Bass Pro Drive

Grapevine, TX 76051

Attn: Ms. Jenny Elste

Date Received: 03-Feb-06
Date Reported 08-Feb-06

Sample No: 06021467-1 Collect Date: 03-Feb-06 14:00
Client Id: JOB #D1154 Site: ECS-ND-A6-SWS-001-2 Locator: GRAB

	Result	Units	Date/Time	Analyst
SM2540B				
Moisture	12.9	%	07-Feb-06 13:34	AG
SW6010B				
Lead	880	mg/kg Dry	07-Feb-06 12:03	JVH
SW-846 3051				
Sample Preparation			06-Feb-06 13:00	DAB

Sample No: 06021467-2 Collect Date: 03-Feb-06 14:02
Client Id: JOB #D1154 Site: ECS-ND-A6-001-2 Locator: GRAB

	Result	Units	Date/Time	Analyst
SM2540B				
Moisture	13.2	%	07-Feb-06 13:35	AG
SW6010B				
Lead	170	mg/kg Dry	07-Feb-06 13:42	JVH
SW-846 3051				
Sample Preparation			06-Feb-06 13:00	DAB

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Attn: Ms. Jenny Elste

Date Received: 03-Feb-06
Date Reported 08-Feb-06

Sample No: 06021467-3 Collect Date: 03-Feb-06 14:05
Client Id: JOB #D1154 Site: ECS-ND-A6-SWE-001-2 Locator: GRAB

	Result	Units	Date/Time	Analyst
SM2540B				
Moisture	9.8	%	07-Feb-06 13:37	AG
SW6010B				
Lead	4000	mg/kg Dry	07-Feb-06 13:50	JVH
SW-846 3051				
Sample Preparation			06-Feb-06 13:00	DAB

Sample No: 06021467-4 Collect Date: 03-Feb-06 14:20
Client Id: JOB #D1154 Site: ECS-ND-A6-SWW-001-2 Locator: GRAB

	Result	Units	Date/Time	Analyst
SM2540B				
Moisture	19	%	07-Feb-06 13:39	AG
SW6010B				
Lead	670	mg/kg Dry	07-Feb-06 13:55	JVH
SW-846 3051				
Sample Preparation			06-Feb-06 13:00	DAB

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Attn: Ms. Jenny Elste

Date Received: 03-Feb-06
Date Reported 08-Feb-06

Sample No: 06021467-5 Collect Date: 03-Feb-06 14:07
Client Id: JOB #D1154 Site: ECS-ND-A6-ND4-001-2 Locator: GRAB

SM2540B	Result	Units	Date/Time	Analyst
Moisture	11.5	%	07-Feb-06 13:40	AG

SW6010B	Result	Units	Date/Time	Analyst
Lead	2400	mg/kg Dry	07-Feb-06 13:59	JVH

SW6010B TCLP	Result	Units	Date/Time	Analyst
Lead, TCLP	< 0.038	mg/l	07-Feb-06 10:33	JVH

SW-846 1311	Result	Units	Date/Time	Analyst
Final pH	8.68		06-Feb-06 11:15	DAB
Leachate Preparation			06-Feb-06 11:15	DAB

SW-846 3015	Result	Units	Date/Time	Analyst
Sample Preparation			07-Feb-06 5:00	DAB

SW-846 3051	Result	Units	Date/Time	Analyst
Sample Preparation			06-Feb-06 13:00	DAB

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Attn: Ms. Jenny Elste

Date Received: 03-Feb-06
Date Reported 08-Feb-06

Sample No: 06021467-6 Collect Date: 03-Feb-06 14:10
Client Id: JOB #D1154 Site: ECS-ND-A5-001-2 Locator: GRAB

SM2540B	Result	Units	Date/Time	Analyst
Moisture	16.9	%	07-Feb-06 13:43	AG

SW6010B	Result	Units	Date/Time	Analyst
Lead	16000	mg/kg Dry	07-Feb-06 14:08	JVH

SW-846 3051	Result	Units	Date/Time	Analyst
Sample Preparation			06-Feb-06 13:00	DAB

Sample No: 06021467-7 Collect Date: 03-Feb-06 14:12
Client Id: JOB #D1154 Site: ECS-ND-A5-SWW-001-2 Locator: GRAB

SM2540B	Result	Units	Date/Time	Analyst
Moisture	8.56	%	07-Feb-06 13:44	AG

SW6010B	Result	Units	Date/Time	Analyst
Lead	200	mg/kg Dry	07-Feb-06 14:12	JVH

SW-846 3051	Result	Units	Date/Time	Analyst
Sample Preparation			06-Feb-06 13:00	DAB

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Attn: Ms. Jenny Elste

Date Received: 03-Feb-06
Date Reported 08-Feb-06

Sample No: 06021467-8 Collect Date: 03-Feb-06 14:14
Client Id: JOB #D1154 Site: ECS-ND-A5-SWE-001-2 Locator: GRAB

SM2540B	Result	Units	Date/Time	Analyst
Moisture	9.75	%	07-Feb-06 13:45	AG

SW6010B	Result	Units	Date/Time	Analyst
Lead	3800	mg/kg Dry	07-Feb-06 14:17	JVH

SW-846 3051	Result	Units	Date/Time	Analyst
Sample Preparation			06-Feb-06 13:00	DAB

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Attn: Ms. Jenny Elste

Date Received: 03-Feb-06
Date Reported 08-Feb-06

Sample No: 06021467-9 Collect Date: 03-Feb-06 14:18
Client Id: JOB #D1154 Site: ECS-ND-A5-ND3-001-2 Locator: GRAB

SM2540B	Result	Units	Date/Time	Analyst
Moisture	12.5	%	07-Feb-06 13:48	AG

SW6010B	Result	Units	Date/Time	Analyst
Lead	2700	mg/kg Dry	07-Feb-06 14:30	JVH

SW6010B TCLP	Result	Units	Date/Time	Analyst
Lead, TCLP	0.065	mg/l	07-Feb-06 10:49	JVH

SW-846 1311	Result	Units	Date/Time	Analyst
Final pH	6.36		06-Feb-06 11:15	DAB
Leachate Preparation			06-Feb-06 11:15	DAB

SW-846 3015	Result	Units	Date/Time	Analyst
Sample Preparation			07-Feb-06 5:00	DAB

SW-846 3051	Result	Units	Date/Time	Analyst
Sample Preparation			06-Feb-06 13:00	DAB

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Attn: Ms. Jenny Elste

Date Received: 03-Feb-06
Date Reported 08-Feb-06

Sample No: 06021467-10 Collect Date: 03-Feb-06 14:34
Client Id: JOB #D1154 Site: ECS-ND-A2-SWW-001-2 Locator: GRAB

	Result	Units	Date/Time	Analyst
SM2540B				
Moisture	19.4	%	07-Feb-06 13:48	AG
SW6010B				
Lead	71	mg/kg Dry	07-Feb-06 14:34	JVH
SW-846 3051				
Sample Preparation			06-Feb-06 13:00	DAB

Sample No: 06021467-11 Collect Date: 03-Feb-06 14:22
Client Id: JOB #D1154 Site: ECS-ND-A4-SWS-001-2 Locator: GRAB

	Result	Units	Date/Time	Analyst
SM2540B				
Moisture	11.5	%	07-Feb-06 13:51	AG
SW6010B				
Lead	1100	mg/kg Dry	07-Feb-06 14:38	JVH
SW-846 3051				
Sample Preparation			06-Feb-06 13:00	DAB

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Attn: Ms. Jenny Elste

Date Received: 03-Feb-06
Date Reported 08-Feb-06

Sample No: 06021467-12 Collect Date: 03-Feb-06 14:24
Client Id: JOB #D1154 Site: ECS-ND-B4-SWS-001-2 Locator: GRAB

	Result	Units	Date/Time	Analyst
SM2540B				
Moisture	10.7	%	07-Feb-06 13:52	AG
SW6010B				
Lead	9100	mg/kg Dry	07-Feb-06 14:42	JVH
SW-846 3051				
Sample Preparation			06-Feb-06 13:00	DAB

Sample No: 06021467-13 Collect Date: 03-Feb-06 14:16
Client Id: JOB #D1154 Site: ECS-ND-A5-SWN-001-2 Locator: GRAB

	Result	Units	Date/Time	Analyst
SM2540B				
Moisture	7.89	%	07-Feb-06 13:57	AG
SW6010B				
Lead	260	mg/kg Dry	07-Feb-06 14:47	JVH
SW-846 3051				
Sample Preparation			06-Feb-06 13:00	DAB

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Attn: Ms. Jenny Elste

Date Received: 03-Feb-06
Date Reported 08-Feb-06

Sample No: 06021467-14 Collect Date: 03-Feb-06 14:26
Client Id: JOB #D1154 Site: ECS-ND-A3-SWW-001-2 Locator: GRAB

	Result	Units	Date/Time	Analyst
SM2540B				
Moisture	14.6	%	07-Feb-06 13:59	AG
SW6010B				
Lead	1200	mg/kg Dry	07-Feb-06 14:51	JVH
SW-846 3051				
Sample Preparation			06-Feb-06 13:00	DAB

Sample No: 06021467-15 Collect Date: 03-Feb-06 14:28
Client Id: JOB #D1154 Site: ECS-ND-B3-SWE-001-2 Locator: GRAB

	Result	Units	Date/Time	Analyst
SM2540B				
Moisture	9.78	%	07-Feb-06 13:59	AG
SW6010B				
Lead	23000	mg/kg Dry	07-Feb-06 14:55	JVH
SW-846 3051				
Sample Preparation			06-Feb-06 13:00	DAB

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Attn: Ms. Jenny Elste

Date Received: 03-Feb-06
Date Reported 08-Feb-06

Sample No: 06021467-16 Collect Date: 03-Feb-06 14:30
Client Id: JOB #D1154 Site: ECS-ND-A3-001-2 Locator: GRAB

SM2540B	Result	Units	Date/Time	Analyst
Moisture	14.7	%	07-Feb-06 14:00	AG

SW6010B	Result	Units	Date/Time	Analyst
Lead	33000	mg/kg Dry	07-Feb-06 14:59	JVH

SW-846 3051	Result	Units	Date/Time	Analyst
Sample Preparation			06-Feb-06 13:00	DAB

Sample No: 06021467-17 Collect Date: 03-Feb-06 14:32
Client Id: JOB #D1154 Site: ECS-ND-B3-001-2 Locator: GRAB

SM2540B	Result	Units	Date/Time	Analyst
Moisture	19.2	%	07-Feb-06 14:02	AG

SW6010B	Result	Units	Date/Time	Analyst
Lead	17000	mg/kg Dry	07-Feb-06 15:37	JVH

SW-846 3051	Result	Units	Date/Time	Analyst
Sample Preparation			06-Feb-06 13:00	DAB

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Attn: Ms. Jenny Elste

Date Received: 03-Feb-06
Date Reported 08-Feb-06

Sample No: 06021467-18
Client Id: JOB #D1154
Site: ECS-ND-B2-SWE-001-2
Collect Date: 03-Feb-06 14:36
Locator: GRAB

	Result	Units	Date/Time	Analyst
SM2540B				
Moisture	15	%	07-Feb-06 14:03	AG
SW6010B				
Lead	920	mg/kg Dry	07-Feb-06 16:05	JVH
SW-846 3051				
Sample Preparation			06-Feb-06 13:00	DAB

Sample No: 06021467-19
Client Id: JOB #D1154
Site: ECS-ND-A2-SWN-001-2
Collect Date: 03-Feb-06 14:38
Locator: GRAB

	Result	Units	Date/Time	Analyst
SM2540B				
Moisture	21.5	%	07-Feb-06 14:05	AG
SW6010B				
Lead	76	mg/kg Dry	07-Feb-06 16:09	JVH
SW-846 3051				
Sample Preparation			06-Feb-06 13:00	DAB

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Attn: Ms. Jenny Elste

Date Received: 03-Feb-06
Date Reported 08-Feb-06

Sample No: 06021467-20 Collect Date: 03-Feb-06 14:40
Client Id: JOB #D1154 Site: ECS-ND-B2-SWN-001-2 Locator: GRAB

SM2540B	Result	Units	Date/Time	Analyst
Moisture	14.2	%	07-Feb-06 14:06	AG

SW6010B	Result	Units	Date/Time	Analyst
Lead	1600	mg/kg Dry	07-Feb-06 16:13	JVH

SW-846 3051	Result	Units	Date/Time	Analyst
Sample Preparation			06-Feb-06 13:00	DAB

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Attn: Ms. Jenny Elste

Date Received: 03-Feb-06
Date Reported 08-Feb-06

Sample No: 06021467-21 Collect Date: 03-Feb-06 14:42
Client Id: JOB #D1154 Site: ECS-ND-A3-ND2-001-2 Locator: GRAB

SM2540B	Result	Units	Date/Time	Analyst
Moisture	10.6	%	07-Feb-06 14:14	AG

SW6010B	Result	Units	Date/Time	Analyst
Lead	1900	mg/kg Dry	07-Feb-06 16:17	JVH

SW6010B TCLP	Result	Units	Date/Time	Analyst
Lead, TCLP	0.05	mg/l	07-Feb-06 10:54	JVH

SW-846 1311	Result	Units	Date/Time	Analyst
Final pH	6.35		06-Feb-06 11:15	DAB
Leachate Preparation			06-Feb-06 11:15	DAB

SW-846 3015	Result	Units	Date/Time	Analyst
Sample Preparation			07-Feb-06 5:00	DAB

SW-846 3051	Result	Units	Date/Time	Analyst
Sample Preparation			06-Feb-06 13:00	DAB

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Attn: Ms. Jenny Elste

Date Received: 03-Feb-06
Date Reported 08-Feb-06

Sample No: 06021467-22 Collect Date: 03-Feb-06 14:44
Client Id: JOB #D1154 Site: ECS-ND-B2-BT-001-2 Locator: GRAB

SM2540B		Result	Units	Date/Time	Analyst
Moisture		12.2	%	07-Feb-06 14:15	AG

SW6010B		Result	Units	Date/Time	Analyst
Lead		320	mg/kg Dry	07-Feb-06 16:21	JVH

SW6010B TCLP		Result	Units	Date/Time	Analyst
Lead, TCLP	J	0.03	mg/l	07-Feb-06 10:59	JVH

SW-846 1311	Result	Units	Date/Time	Analyst
Final pH	6.33		06-Feb-06 11:15	DAB
Leachate Preparation			06-Feb-06 11:15	DAB

SW-846 3015	Result	Units	Date/Time	Analyst
Sample Preparation			07-Feb-06 5:00	DAB

SW-846 3051	Result	Units	Date/Time	Analyst
Sample Preparation			06-Feb-06 13:00	DAB

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Grapevine, TX 76051

Attn: Ms. Jenny Elste

Date Received: 03-Feb-06
Date Reported 08-Feb-06

Sample No: 06021467-23 Collect Date: 03-Feb-06 14:30
Client Id: JOB #D1154 Site: ECS-ND-A3(X)-001-2 Locator: GRAB

SM2540B	Result	Units	Date/Time	Analyst
Moisture	17.3	%	07-Feb-06 14:16	AG

SW6010B	Result	Units	Date/Time	Analyst
Lead	93	mg/kg Dry	07-Feb-06 16:25	JVH

SW-846 3051	Result	Units	Date/Time	Analyst
Sample Preparation			06-Feb-06 13:00	DAB

Sample No: 06021467-24 Collect Date: 03-Feb-06 14:02
Client Id: JOB #D1154 Site: ECS-ND-A6(X)-001-2 Locator: GRAB

SM2540B	Result	Units	Date/Time	Analyst
Moisture	12.9	%	07-Feb-06 14:18	AG

SW6010B	Result	Units	Date/Time	Analyst
Lead	3300	mg/kg Dry	07-Feb-06 16:38	JVH

SW-846 3051	Result	Units	Date/Time	Analyst
Sample Preparation			06-Feb-06 13:00	DAB

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Entact - Dallas Office
3129 Bass Pro Drive

Grapevine, TX 76051

Attn: Ms. Jenny Elste

Date Received: 03-Feb-06
Date Reported 08-Feb-06

Certified by: Lisa Grant

Lisa Grant, Project Manager

PDC Laboratories participates in the following laboratory accreditation/certification and proficiency programs. Endorsement by the Federal or State Government or their agencies is not implied.

State of Illinois Chemical Analysis in Drinking Water Accredited Lab. No. 100230
State of Illinois Bacteriological Analysis in Drinking Water Certified Lab Registry No. 17533
State of Arkansas Certified Wastewater and Hazardous Waste Lab
State of Indiana Certified Drinking Water Lab No. C-IL-04
State of Iowa Certified Wastewater Lab No. 240
American Industrial Hygiene Association Bulk/Air Asbestos Proficiency Program Lab ID No. 101206
State of North Dakota Wastewater and Hazardous Waste Certified Lab No. R-094
State of Wisconsin Certified Wastewater and Hazardous Waste Lab ID No. 998294430

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Attn: Ms. Jenny Elste

Date Received: 25-Jan-06
Date Reported 27-Jan-06

Sample No: 06013543-1 Collect Date: 25-Jan-06 8:30
Client Id: JOB #D1154 Site: CS-ND-SP1-001-0 Locator: KEYSTONE

	Result		Units	Date / Time	By
SW6010B TCLP					
Lead, TCLP	J	0.0061	mg/l	27-Jan-06 7:37	JVH
SW-846 1311					
Final pH		5.68		26-Jan-06 11:45	JMM
Leachate Preparation				26-Jan-06 11:45	JMM
SW-846 3015					
Sample Preparation				27-Jan-06 5:00	JMM

Sample No: 06013543-2 Collect Date: 25-Jan-06 8:34
Client Id: JOB #D1154 Site: CS-ND-SP2-001 Locator: KEYSTONE

	Result		Units	Date / Time	By
SW6010B TCLP					
Lead, TCLP		0.24	mg/l	27-Jan-06 7:41	JVH
SW-846 1311					
Final pH		5.36		26-Jan-06 11:45	JMM
Leachate Preparation				26-Jan-06 11:45	JMM
SW-846 3015					
Sample Preparation				27-Jan-06 5:00	JMM

PDC Laboratories, Inc.
P.O. Box 9071 • Peoria, IL 61612-9071
(309) 692-9688 • (800) 752-6651 • FAX (309) 692-9689

ACCREDITED IN ACCORDANCE WITH nelac

Entact - Dallas Office
3129 Bass Pro Drive
Grapevine, TX 76051

Attn: Ms. Jenny Elste

Date Received: 25-Jan-06
Date Reported 27-Jan-06

Sample No: 06013543-3 Collect Date: 25-Jan-06 8:36
Client Id: JOB #D1154 Site: CS-ND-SP3-001 Locator: KEYSTONE

	Result	Units	Date / Time	By
SW6010B TCLP				
Lead, TCLP	0.043	mg/l	27-Jan-06 7:44	JVH
SW-846 1311				
Final pH	5.51		26-Jan-06 11:45	JMM
Leachate Preparation			26-Jan-06 11:45	JMM
SW-846 3015				
Sample Preparation			27-Jan-06 5:00	JMM

Sample No: 06013543-4 Collect Date: 25-Jan-06 8:38
Client Id: JOB #D1154 Site: CS-ND-SP4-001 Locator: KEYSTONE

	Result	Units	Date / Time	By
SW6010B TCLP				
Lead, TCLP	0.016	mg/l	27-Jan-06 7:48	JVH
SW-846 1311				
Final pH	5.5		26-Jan-06 11:45	JMM
Leachate Preparation			26-Jan-06 11:45	JMM
SW-846 3015				
Sample Preparation			27-Jan-06 5:00	JMM

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Entact - Dallas Office
3129 Bass Pro Drive
Grapevine, TX 76051

Attn: Ms. Jenny Elste

Date Received: 25-Jan-06
Date Reported 27-Jan-06

Certified by: Lisa Grant
Lisa Grant, Project Manager

PDC Laboratories participates in the following laboratory accreditation/certification and proficiency programs. Endorsement by the Federal or State Government or their agencies is not implied.

State of Illinois Chemical Analysis in Drinking Water Accredited Lab. No. 100230
State of Illinois Bacteriological Analysis in Drinking Water Certified Lab Registry No. 17533
State of Arkansas Certified Wastewater and Hazardous Waste Lab
State of Indiana Certified Drinking Water Lab No. C-IL-04
State of Iowa Certified Wastewater Lab No. 240
American Industrial Hygiene Association Bulk/Air Asbestos Proficiency Program Lab ID No. 101206
State of North Dakota Wastewater and Hazardous Waste Certified Lab No. R-094
State of Wisconsin Certified Wastewater and Hazardous Waste Lab ID No. 998294430

Entact – Keystone Steel & Wire Site

RDL/MDL Table

Parameter	RDL	MDL
Lead, TCLP	0.0075 mg/l	0.0085 mg/l

CHAIN OF CUSTODY RECORD

SAMPLE
- ☒ Treated Stockpile
- ☐ Untreated Stockpile
- ☐ Excavation Verification
- ☐ Air _____
- ☐ Groundwater
- ☐ Other _____

ENTACT

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1010 EXECUTIVE COURT
SUITE 280
WESTMONT, IL 60559
630.986.2900
630.986.0653 f

☒ **DALLAS OFFICE**
4040 WEST ROYAL LANE
SUITE 136
IRVING, TX 75063
972.580.1323
972.550.7484 f

"Safety keeps you ENTACT"

PROJECT INFORMATION

NAME Keystone | JOB NUMBER D1154
LOCATION Peoria, IL | PHONE 309-697-7051
CONTACT Jason McCorvey | EMAIL

REQUIRED TURNAROUND
- ☐ Standard
- ☐ 5 Day
- ☐ 3 Day
- ☒ 48 Hour
- ☐ 24 Hour

DETECTION LIMIT CRITERIA
IEPA ADL or RQL SW846

COMMENTS

SAMPLE NUMBER	SAMPLE DESCRIPTION	DATE	TIME	TYPE: MATRIX	TYPE: GRAB	TYPE: COMPOSITE	PRESERVATIVE: HCL	PRESERVATIVE: HNO3	PRESERVATIVE: NONE	PRESERVATIVE: ICE	AIR	NUMBER OF CONTAINERS SUPPLIED FOR EACH SAMPLE	TCLP 8260	FILTERED Y/N FIELD / LAB ___ MICRON FILTER
1	CS-ND-SP1-001-0	012506	0830	S	Y				X			1	X	
2	CS-ND-SP2-001	012506	0834	S	Y				X			1	X	
3	CS-ND-SP3-001	012506	0836	S	Y				X			1	X	
4	CS-ND-SP4-001	012506	0838	S	X				X			1	X	

SHIPPING METHOD: PDC Delivery | AIRBILL NO: | SAMPLER: B Hays | LAB NAME: PDC

SIGNATURE:	DATE: 01-25-06	SIGNATURE: Diane Blevins	DATE: 1-25-06	SIGNATURE	DATE
PRINTED NAME:	TIME	PRINTED NAME: Diane Blevins	TIME: 2:20	PRINTED NAME:	TIME
SIGNATURE: Diane Blevins	DATE: 1-25-06	SIGNATURE: M. Whitt	DATE: 4/27/06	SIGNATURE:	DATE
PRINTED NAME: Diane Blevins	TIME: 1:55	PRINTED NAME: MEGAN WHITT	TIME: 2:20	PRINTED NAME:	TIME

MEDIA: S - Soil W - Water A - Air **DISTRIBUTION:** White Copy - To Customer w/Report Pink Copy - To Job File Yellow Copy - To Lab

CASE NARRATIVE – Entact – Keystone Steel & Wire Site

PDC Laboratories, Inc. received 4 samples on January 25, 2005 at 15:00on ice and in good condition. This sample set was designated as Sample Delivery Group 06013543. All samples were for TCLP Lead. A turnaround time of 48 hours was requested.

Sample ID's		Date	
Field	**Lab ID**	**Collected**	**Received**
CS-ND-SP1-001-0	06013543-1	01/25/06	01/25/06
CS-ND-SP2-001	06013543-2	01/25/06	01/25/06
CS-ND-SP3-001	06013543-3	01/25/06	01/25/06
CS-ND-SP4-001	06013543-4	01/25/06	01/25/06

Project Summary

Samples were prepared and/or analyzed utilizing the methodologies as listed on the attached report.

Trace Metals Summary

All holding time criteria were met for all samples.

All Initial Calibration, Initial Calibration Verification and Continuing Calibration Verification Standards were within acceptance limits.

All Method Blanks, Initial Calibration Blanks and Continuing Calibration Blanks were free of contamination for target analytes above report limits (RL).

All associated Laboratory Control Sample (LCS) recoveries were within acceptance limits.

All Interference Check Samples were within QC criteria.

The Matrix Spike and Matrix Spike Duplicate performed on the sample had all recoveries were within acceptance limits and the RPD's were within acceptance limits. Since batch QC was not performed on an Entact sample this data is not provided in this QC summary.

Certification

This data package is in compliance with PDC Laboratories, Inc Quality Control Plan. Release of the data contained in this hard copy data package has been authorized by the Laboratory Manager or his designee, as verified by the following signature. A full QC summary for metals and inorganic analysis and a forms package for organic analysis are attached with this final report.

Signature: Lisa Y. Grant Name: Lisa Y. Grant

Date: 2/1/06 Title: Project Manager

TCLP METALS
QC SUMMARY

[redacted]ECT: 06013543

METALS ANALYSIS (SW6010) AND PREPARATION (SW3051)
CONTINUING CALIBRATION VERIFICATION

CONTINUING CALIBRATION VERIFICATION

Laboratory ID: WG117522-3 Analysis Lot: WG117522 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, TCLP	MG/L	4.0	4.0	100	90.0-110	27-Jan-06 07:18

Laboratory ID: WG117522-5 Analysis Lot: WG117522 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, TCLP	MG/L	4.0	4.1	102	90.0-110	27-Jan-06 08:19

PDC Laboratories Quality Control Summary Report

OJECT: 06013543

METALS ANALYSIS (SW6010) AND PREPARATION (SW3051)
QC CROSS REFERENCE REPORT

Lab ID	Client ID	Prep. Lot	Analysis Lot	Analysis Date	Analyst	Method	Sample Tag
06013543-1	CS-ND-SP1-001-0	WG117510	WG117522	27-Jan-06 07:37	JVH	SW6010B	D1:1
06013543-2	CS-ND-SP2-001	WG117510	WG117522	27-Jan-06 07:41	JVH	SW6010B	D1:1
06013543-3	CS-ND-SP3-001	WG117510	WG117522	27-Jan-06 07:44	JVH	SW6010B	D1:1
06013543-4	CS-ND-SP4-001	WG117510	WG117522	27-Jan-06 07:48	JVH	SW6010B	D1:1

METHOD BLANK

Laboratory ID: WG117510-1 Analysis Lot: WG117522 Prep Batch: WG117510 Sample Tag: D1:1

Analyte	Units	Value	RDL	Analysis Date
Lead, TCLP	MG/L	0.0075U	0.0075	27-Jan-06 07:28

LABORATORY CONTROL SAMPLE

Laboratory ID: WG117510-2 Analysis Lot: WG117522 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, TCLP	MG/L	5.56	5.90	106	80.0-120	27-Jan-06 07:32

INITIAL CALIBRATION VERIFICATION

Laboratory ID: WG117522-1 Analysis Lot: WG117522 Sample Tag: D1:1

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, TCLP	MG/L	4.00	4.1	102	90.0-110	27-Jan-06 06:24

INITIAL CALIBRATION BLANK

Laboratory ID: WG117522-2 Analysis Lot: WG117522

Analyte	Units	Value	RDL	Analysis Date
Lead, TCLP	MG/L	0.0075U	0.0075	27-Jan-06 06:31

CONTINUING CALIBRATION BLANK

Laboratory ID: WG117522-4 Analysis Lot: WG117522

Analyte	Units	Value	RDL	Analysis Date
Lead, TCLP	MG/L	0.0075U	0.0075	27-Jan-06 07:23

Laboratory ID: WG117522-6 Analysis Lot: WG117522

Analyte	Units	Value	RDL	Analysis Date
Lead, TCLP	MG/L	0.0075U	0.0075	27-Jan-06 08:24

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Entact - Dallas Office
3129 Bass Pro Drive
Grapevine, TX 76051

Attn: Ms. Jenny Elste

Date Received: 23-Nov-05
Date Reported 02-Dec-05

Sample No: 05113698-1 Collect Date: 22-Nov-05 14:30
Client Id: PROJECT #D-1154 Site: CS-ND-2-001-1 Locator: GRAB

	Result	Units	Date / Time	By
SW6010B TCLP				
Lead Spike Recovery	94	%	01-Dec-05 7:00	KMC
Lead, TCLP	1.04	mg/l	01-Dec-05 7:00	KMC
SW-846 1311				
Final pH	5.14		29-Nov-05 14:00	JMM
Leachate Preparation			29-Nov-05 14:00	JMM
SW-846 3015				
Sample Preparation			30-Nov-05 5:00	JMM

Sample No: 05113698-2 Collect Date: 22-Nov-05 14:25
Client Id: PROJECT #D-1154 Site: CS-ND-3-001-1.5 Locator: GRAB

	Result	Units	Date / Time	By
SW6010B TCLP				
Lead Spike Recovery	94	%	01-Dec-05 7:00	KMC
Lead, TCLP	0.82	mg/l	01-Dec-05 7:00	KMC
SW-846 1311				
Final pH	6.04		29-Nov-05 14:00	JMM
Leachate Preparation			29-Nov-05 14:00	JMM
SW-846 3015				
Sample Preparation			30-Nov-05 5:00	JMM

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ACCREDITED IN ACCORDANCE WITH nelac

Entact - Dallas Office
3129 Bass Pro Drive
Grapevine, TX 76051

Attn: Ms. Jenny Elste

Date Received: 23-Nov-05
Date Reported 02-Dec-05

Sample No: 05113698-3 Collect Date: 22-Nov-05 14:20
Client Id: PROJECT #D-1154 Site: CS-ND-4-001-1 Locator: GRAB

	Result	Units	Date / Time	By
SW6010B TCLP				
Lead Spike Recovery	94	%	01-Dec-05 7:00	KMC
Lead, TCLP	4	mg/l	01-Dec-05 7:00	KMC
SW-846 1311				
Final pH	5.92		29-Nov-05 14:00	JMM
Leachate Preparation			29-Nov-05 14:00	JMM
SW-846 3015				
Sample Preparation			30-Nov-05 5:00	JMM

Certified by: _____
Lisa Grant, Project Manager

PDC Laboratories participates in the following laboratory accreditation/certification and proficiency programs. Endorsement by the Federal or State Government or their agencies is not implied.

State of Illinois Chemical Analysis in Drinking Water Accredited Lab. No. 100230
State of Illinois Bacteriological Analysis in Drinking Water Certified Lab Registry No. 17533
State of Arkansas Certified Wastewater and Hazardous Waste Lab
State of Indiana Certified Drinking Water Lab No. C-IL-04
State of Iowa Certified Wastewater Lab No. 240
American Industrial Hygiene Association Bulk/Air Asbestos Proficiency Program Lab ID No. 101206
State of North Dakota Wastewater and Hazardous Waste Certified Lab No. R-094
State of Wisconsin Certified Wastewater and Hazardous Waste Lab ID No. 998294430

North Ditch Staging Area

CHAIN OF CUSTODY RECORD

SAMPLE TYPE
- ☐ Treated Stockpile
- ☐ Untreated Stockpile
- ☐ Excavation Verification
- ☐ Air _____
- ☐ Groundwater
- ☐ Other _____

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SUITE 280
WESTMONT, IL 60559
630.986.2900
630.986.0853 f

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4040 WEST ROYAL LANE
SUITE 136
IRVING, TX 75063
972.580.1323
972.550.7464 f

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PROJECT INFORMATION

NAME Keystone ENTACT
LOCATION Peoria IL
CONTACT Elste/Crunk/McGarvey
JOB NUMBER D 1154
PHONE 304-697-7051
EMAIL

REQUIRED TURNAROUND
- ☐ Standard
- ☐ 5 Day
- ☐ 3 Day
- ☐ 48 Hour
- ☐ 24 Hour

DETECTION LIMIT/CRITERIA
IEPA AQL of
SW846 PQL

COMMENTS

SAMPLE NUMBER	DESCRIPTION	DATE	TIME	TYPE: MATRIX	TYPE: GRAB	TYPE: COMPOSITE	PRESERVATIVE: HCL	PRESERVATIVE: HNO3	PRESERVATIVE: NONE	PRESERVATIVE: ICE	AIR	NUMBER OF CONTAINERS SUPPLIED FOR EACH SAMPLE	ANALYSES / METHOD: TCLP Pb	FILTERED Y / N FIELD / LAB ___ MICRON FILTER	COMMENTS
1	CS-ND-2-001-1	11-22-05	1430	S	X					X			X		
2	CS-ND-3-001-1.5	11-22-05	1425	S	X					X			X		
3	CS-ND-4-001-1	11-22-05	1420	S	X					X			X		
~~4~~	~~CS-ND-DL116-001-0/1~~	~~11-22-05~~		S	X					X			X		Not Collected
~~5~~	~~CS-ND-DL116-002-2~~	~~11-22-05~~		S	X					X			X		Not Collected
~~6~~	~~CS-ND-DL116-003-2~~	~~11-22-05~~		S	X					X			X		Not Collected
															Samples placed on ice by PDC Courier

SHIPPING METHOD: Hand Delivery
AIRBILL NO: ———
SAMPLER: CRUNK
LAB NAME: PDL

SIGNATURE: [illegible]	DATE: 11-23-05	SIGNATURE: Diane Blevins	DATE: 11-23-05
PRINTED NAME:	TIME:	PRINTED NAME: Diane Blevins	TIME: 12:50
SIGNATURE: Diane Blevins	DATE: 11-23-05	SIGNATURE: Diane Blevins	DATE: 11-23-05
PRINTED NAME: Diane Blevins	TIME: 12:15	PRINTED NAME: Diane Blevins	TIME: 2:10

SIGNATURE: Diane Blevins	DATE: 11-23-05	
PRINTED NAME: Diane Blevins	TIME: 2:35	
SIGNATURE: Kendra Whitman	DATE: 11-23-05	
PRINTED NAME: Kendra Whitman	TIME: 1410	

MEDIA: S - Soil W - Water A - Air DISTRIBUTION: White Copy - To Customer w/Report Pink Copy - To Job File Yellow Copy - To Lab

CASE NARRATIVE – Entact – Keystone Steel & Wire Site

PDC Laboratories, Inc. received 3 samples on November 23, 2005 at 14:10 on ice and in good condition. This sample set was designated as Sample Delivery Group 05113698. All samples were for TCLP Lead. A turnaround time of 2 days was requested. Due to sample numbers, the Thanksgiving holiday and work load at PDC Laboratories, Inc a TAT of 5 days was settled on.

Sample ID's		Date	
Field	**Lab ID**	**Collected**	**Received**
CS-ND-2-001-1	05113698-1	11/22/05	11/23/05
CS-ND-3-001-1.5	05113698-2	11/22/05	11/23/05
CS-ND-4-001-1	05113698-3	11/22/05	11/23/05

Project Summary

Samples were prepared and/or analyzed utilizing the methodologies as listed on the attached report.

Trace Metals Summary

All holding time criteria were met for all samples.

All Initial Calibration, Initial Calibration Verification and Continuing Calibration Verification Standards were within acceptance limits.

All Method Blanks, Initial Calibration Blanks and Continuing Calibration Blanks were free of contamination for target analytes above report limits (RL) with the following exception: CCV analyzed 8:17 had concentration of 0.0078 mg/l present. RL is 0.0075. Presence had no impact on sample data. All results were sufficiently high or not detectable to be effected by the amount in this CCV.

All associated Laboratory Control Sample (LCS) recoveries were within acceptance limits.

All Interference Check Samples were within QC criteria. Not included in QC summary. IECs are verified weekly as acceptable. Not analyzed on the day of this analysis.

The Matrix Spike and Matrix Spike Duplicate performed on the sample batch (not performed on an Entact sample) had all recoveries and RPD's within acceptance limits.

Certification

This data package is in compliance with PDC Laboratories, Inc Quality Control Plan. Release of the data contained in this hard copy data package has been authorized by the Laboratory Manager or his designee, as verified by the following signature. A full QC summary for metals and inorganic analysis and a forms package for organic analysis are attached with this final report.

Signature: Lisa Y. Grant Name: Lisa Y. Grant

Date: 12/7/05 Title: Project Manager

Entact – Keystone Steel & Wire Site

RDL/MDL Table

Parameter	RDL	MDL
Lead, TCLP	0.0075 mg/l	0.0051 mg/l
Chromium, TCLP	0.004 mg/l	0.001 mg/l
Arsenic, Total	2.5 mg/kg	0.018 mg/kg
Cadmium, Total	0.25 mg/kg	0.0029 mg/kg
Lead, Total	1.2 mg/kg	0.01 mg/kg
Silver, Total	1.2 mg/kg	0.0053 mg/kg
Arsenic, SPLP	0.05 mg/l	0.023 mg/l
Cadmium, SPLP	0.002 mg/l	0.0008 mg/l
Lead, SPLP	0.0075 mg/l	0.0051 mg/l
Silver, SPLP	0.01 mg/l	0.0038 mg/l
Benzo(a)anthracene, Total	330 ug/kg	55 ug/kg
Benzo(a)pyrene, Total	330 ug/kg	101 ug/kg
Benzo(b)fluoranthene, Total	330 ug/kg	117 ug/kg

METALS – TCLP DATA SUMMARY

PDC Laboratories Quality Control Summary Report

PROJECT: 05113698

METALS ANALYSIS (SW6010) AND PREPARATION (SW3051)
QC CROSS REFERENCE REPORT

Lab ID	Client ID	Prep. Lot	Analysis Lot	Analysis Date	Analyst	Method	Sample Tag
05113698-1	CS-ND-2-001-1		WG115307	01-Dec-05 07:00	KMC	SW6010B	
05113698-2	CS-ND-3-001-1.5		WG115307	01-Dec-05 07:00	KMC	SW6010B	
05113698-3	CS-ND-4-001-1		WG115307	01-Dec-05 07:00	KMC	SW6010B	

METHOD BLANK

Laboratory ID: WG115323-1 Analysis Lot: WG115307 Prep Batch: N/A Sample Tag:

Analyte	Units	Value	RDL	Analysis Date
Lead, TCLP	MG/L	0.0075U	0.0075	01-Dec-05 09:12

LABORATORY CONTROL SAMPLE

Laboratory ID: WG115323-2 Analysis Lot: WG115307 Sample Tag:

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, TCLP	MG/L	5.00	5.40	108	80.0-120	01-Dec-05 09:19

INITIAL CALIBRATION VERIFICATION

Laboratory ID: WG115323-3 Analysis Lot: WG115307 Sample Tag:

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, TCLP	MG/L	2.00	2.0	101	90.0-110	01-Dec-05 07:01

INITIAL CALIBRATION BLANK

Laboratory ID: WG115323-4 Analysis Lot: WG115307

Analyte	Units	Value	RDL	Analysis Date
Lead, TCLP	MG/L	0.0075U	0.0075	01-Dec-05 07:05

CONTINUING CALIBRATION BLANK

Laboratory ID: WG115323-10 Analysis Lot: WG115307

Analyte	Units	Value	RDL	Analysis Date
Lead, TCLP	MG/L	0.0023J	0.0075	01-Dec-05 10:00

Laboratory ID: WG115323-6 Analysis Lot: WG115307

Analyte	Units	Value	RDL	Analysis Date
Lead, TCLP	MG/L	0.0078B	0.0075	01-Dec-05 08:17

OJECT: 05113698

METALS ANALYSIS (SW6010) AND PREPARATION (SW3051)
CONTINUING CALIBRATION BLANK

Laboratory ID: WG115323-8 Analysis Lot: WG115307

Analyte	Units	Value	RDL	Analysis Date
Lead, TCLP	MG/L	0.0017J	0.0075	01-Dec-05 09:09

CONTINUING CALIBRATION VERIFICATION

Laboratory ID: WG115323-5 Analysis Lot: WG115307 Sample Tag:

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, TCLP	MG/L	2.0	2.0	100	90.0-110	01-Dec-05 08:13

Laboratory ID: WG115323-7 Analysis Lot: WG115307 Sample Tag:

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, TCLP	MG/L	2.0	2.0	101	90.0-110	01-Dec-05 09:05

Laboratory ID: WG115323-9 Analysis Lot: WG115307 Sample Tag:

Analyte	Units	Spiked	Measured	%Recovery	Limits	Analysis Date
Lead, TCLP	MG/L	2.0	1.9	96.8	90.0-110	01-Dec-05 09:53

ATTACHMENT 2

PHOTOGRAPHS

Photograph No. 1: View of the consolidated and treated material at the North Ditch Staging Area

Photograph No. 2: View of the consolidated and treated material at the North Ditch Staging Area

Photograph No. 3: View of the consolidated and treated material at the North Ditch Staging Area

Photograph No. 4: View of the loading of treated soils from the North Ditch Staging Area

Photograph No. 5: View of loading of treated soils from the North Ditch Staging Area

ATTACHMENT 3

DAILY WORK REPORTS

ENTACT Services, LLC

Date 11/8/2005

Daily Project Summary

Project Name: Keystone
Project Location: Bartonville, IL.
Customer: Keystone Wire & Steel
ENTACT Project #: D-1154

Entact Personnel

Name	Start Time	Finish Time	Hours
Brent Hays	6:30 AM	5:30 PM	10.5
Aaron McCorvey	6:30 AM	5:30 PM	10.5
649 Personnel			
Mike Staley	6:30 AM	5:30 PM	10.5
Tony Erickson	6:30 AM	5:30 PM	10.5
James Stout	6:30 AM	5:30 PM	10.5
Mike High	6:30 AM	5:30 PM	10.5
Bobby Chambers	6:30 AM	5:30 PM	10.5
Ken Walker	6:30 AM	5:30 PM	10.5
165 Personnel			
Nick Keagel	7:00 AM	5:30 PM	10
Leroy Richardson	7:00 AM	5:30 PM	10

Equipment

Description	Mob Date	Demob Date	Hours
Komatsu PC 300	7/12/2005		10
Cat 950G	7/15/2005		0
Cat D5	7/15/2005		10
John Deere 300D	7/18/2005	10/26/2005	0
Finlay Screen	7/19/2005	9/20/2005	0
Volvo 240	7/25/2005		10
Volvo 240	8/2/2005		10
John Deere 250	8/22/2005		10
John Deere 250	10/14/2005		0
John Deere 250	10/21/2005		10

Entact Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verafied)	Problem / Delays / Changes
1. Mobilization	0.0%	100.0%	100.0%	
2. Site Setup	0.0%	100.0%	100.0%	
3. Utility location	0.0%	100.0%	100.0%	
4. Clear and grub	0.0%	82.0%	82.0%	The remainder of the clearing will be completed as the LSD is stabilized and we can get to the east side of the ditch.
5. Lower South Ditch Stabilize and Consolidate	1.0%	53.0%	0.0%	
6. Lower South Ditch Hot Spots	0.0%	110.0%	110.0%	Loaded out additional treated material
7. South Ditch	0.0%	57.0%	0.0%	Complete treatment of 50%
8. South Borrow Waste Pile	0.0%	100.0%	0.0%	
9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping)	0.0%	82.0%	0.0%	
10. Stained Soil Area	0.0%	0.0%	0.0%	
11. Site Restoration	0.0%	0.0%	0.0%	
12. Demobilization	0.0%	0.0%	0.0%	
13. North Ditch Staging Area	1.0%	1.0%	0.0%	Stake out North Ditch Staging Area

Sub-Contractor Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verafied)	Problem / Delays / Changes
Relocate buffer tanks	0%	82%	0%	Installing piping
	0%	0%	0%	
	0%	0%	0%	

Material Delivery

Description	Qty.

Weather Conditions

Temp.	80
Wind	calm
Precip	

Other (note equipment delivery and pickup here)

Description of Work Performed

Entact is in the Lower South Ditch stabilizing and consolidating. Entact is continuing to screen soil conditioner. Stake out North Ditch Staging Area sample points. Brent Hays and Russ Perry staked out the North Ditch Staging Area.

Completed By: Brent Hays

ENTACT Services, LLC

Date 11/22/2005

Daily Project Summary

Project Name: Keystone
Project Location: Bartonville, IL.
Customer: Keystone Wire & Steel
ENTACT Project #: D-1154

Entact Personnel			
Name	**Start Time**	**Finish Time**	**Hours**
Brent Hays	6:30 AM	5:30 PM	10.5
Aaron McCorvey	6:30 AM	5:30 PM	10.5
Joe Cronk	6:30 AM	5:30 PM	10.5
649 Personnel			
Mike Staley	6:30 AM	5:30 PM	10.5
Tony Erickson	6:30 AM	5:30 PM	10.5
James Stout	6:30 AM	5:30 PM	10.5
Mike High	6:30 AM	5:30 PM	10.5
Bobby Chambers	6:30 AM	5:30 PM	10.5
Ken Walker	6:30 AM	5:30 PM	10.5
165 Personnel			
Nick Keagel	7:00 AM	5:30 PM	10
Leroy Richardson	7:00 AM	5:30 PM	10

Equipment			
Description	**Mob Date**	**Demob Date**	**Hours**
Komatsu PC 300	7/12/2005		10
Cat 950G	7/15/2005		0
Cat D5	7/15/2005		10
John Deere 300D	7/18/2005	10/26/2005	0
Finlay Screen	7/19/2005	9/20/2005	0
Volvo 240	7/25/2005		10
Volvo 240	8/2/2005		10
John Deere 250	8/22/2005		10
John Deere 250	10/14/2005		0
John Deere 250	10/21/2005		10

Entact Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verified)	Problem / Delays / Changes
1. Mobilization	0.0%	100.0%	100.0%	
2. Site Setup	0.0%	100.0%	100.0%	
3. Utility location	0.0%	100.0%	100.0%	
4. Clear and grub	0.0%	82.0%	82.0%	The remainder of the clearing will be completed as the LSD is stabilized and we can get to the east side of the ditch.
5. Lower South Ditch Stabilize and Consolidate	1.0%	63.0%	0.0%	
6. Lower South Ditch Hot Spots	0.0%	110.0%	110.0%	Loaded out additional treated material
7. South Ditch	0.0%	57.0%	0.0%	Complete treatment of 50%
8. South Borrow Waste Pile	10.0%	120.0%	0.0%	Treating additional material
9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping)	0.0%	82.0%	0.0%	
10. Stained Soil Area	0.0%	0.0%	0.0%	
11. Site Restoration	0.0%	0.0%	0.0%	
12. Demobilization	0.0%	0.0%	0.0%	
13. North Ditch Staging Area	1.0%	2.0%	0.0%	Grap samples collected at each of the 2002 sample locations

Sub-Contractor Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verified)	Problem / Delays / Changes
Relocate Buffer tanks	0%	82%	0%	Installing piping
	0%	0%	0%	
	0%	0%	0%	

Material Delivery	
Description	**Qty.**

Weather Conditions	
Temp.	44
Wind	calm
Precip	

Other (note equipment delivery and pickup here)

Description of Work Performed

Entact is in the Lower South Ditch stabilizing and consolidating. Entact is continuing to screen soil conditioner. Stake out North Ditch Staging Area sample points. Brent Hays and Russ Perry staked out the North Ditch Staging Area.

Completed By: Brent Hays

ENTACT Services, LLC

Date 12/2/2005

Daily Project Summary

Project Name: Keystone
Project Location: Bartonville, IL.
Customer: Keystone Wire & Steel
ENTACT Project #: D-1154

Entact Personnel			
Name	**Start Time**	**Finish Time**	**Hours**
Brent Hays	6:30 AM	5:30 PM	10.5
Aaron McCorvey	6:30 AM	5:30 PM	10.5
Joe Cronk	6:30 AM	5:30 PM	10.5
649 Personnel			
Mike Staley	6:30 AM	5:30 PM	10.5
Tony Erickson	6:30 AM	5:30 PM	10.5
James Stout	6:30 AM	5:30 PM	10.5
Mike High	6:30 AM	5:30 PM	10.5
Bobby Chambers	6:30 AM	5:30 PM	10.5
Ken Walker	6:30 AM	5:30 PM	10.5
165 Personnel			
Nick Keagel	7:00 AM	5:30 PM	10
Leroy Richardson	7:00 AM	5:30 PM	10

Equipment			
Description	**Mob Date**	**Demob Date**	**Hours**
Komatsu PC 300	7/12/2005		10
Cat 950G	7/15/2005		0
Cat D5	7/15/2005		10
John Deere 300D	7/18/2005	10/26/2005	0
Finlay Screen	7/19/2005	9/20/2005	0
Volvo 240	7/25/2005		10
Volvo 240	8/2/2005		10
John Deere 250	8/22/2005		10
John Deere 250	10/14/2005		0
John Deere 250	10/21/2005		10

Entact Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verafied)	Problem / Delays / Changes
1. Mobilization	0.0%	100.0%	100.0%	
2. Site Setup	0.0%	100.0%	100.0%	
3. Utility location	0.0%	100.0%	100.0%	
4. Clear and grub	0.0%	82.0%	82.0%	The remainder of the clearing will be completed as the LSD is stabilized and we can get to the east side of the ditch.
5. Lower South Ditch Stabilize and Consolidate	1.0%	69.0%	0.0%	
6. Lower South Ditch Hot Spots	0.0%	110.0%	110.0%	Loaded out additional treated material
7. South Ditch	0.0%	57.0%	0.0%	Completed treatment of 50%
8. South Borrow Waste Pile	0.0%	120.0%	0.0%	Treating additional material
9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping)	0.0%	82.0%	0.0%	
10. Stained Soil Area	0.0%	0.0%	0.0%	
11. Site Restoration	0.0%	0.0%	0.0%	
12. Demobilization	0.0%	0.0%	0.0%	
13. North Ditch Staging Area	1.0%	3.0%	0.0%	Received results from grab samples collected at each of the 2002 sample locations

Sub-Contractor Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verafied)	Problem / Delays / Changes
Relocate Buffer tanks	0%	82%	0%	Installing piping
	0%	0%	0%	
	0%	0%	0%	

Material Delivery	
Description	**Qty.**

Weather Conditions	
Temp.	21
Wind	calm
Precip	.1in snow

Other (note equipment delivery and pickup here)

Description of Work Performed

Entact is in the Lower South Ditch stabilizing and consolidating. Entact is continuing to screen soil conditioner. TEP is not working due to snow. Entact rents skid steer and removes snow from retention basin. Entact receives post-excavation and post-treatment sample results. All results are within limits and Entact will begin loading out SBAWP material on Monday 12/5/05. Entact receives the results for the samples collected in the North Ditch Staging Area. The results are <5 mg/l TCLP lead.

Completed By: Brent Hays

ENTACT Services, LLC

Date 1/23/2006

Daily Project Summary

Project Name: Keystone
Project Location: Bartonville, IL.
Customer: Keystone Wire & Steel
ENTACT Project #: D-1154

Entact Personnel			
Name	**Start Time**	**Finish Time**	**Hours**
Brent Hays	6:30 AM	5:30 PM	10.5
Aaron McCorvey	6:30 AM	5:30 PM	10.5
649 Personnel			
Todd Shreves	6:30 AM	5:30 PM	10.5
Tony Erickson	6:30 AM	5:30 PM	10.5
James Stout	6:30 AM	5:30 PM	10.5
James Schmitt	6:30 AM	5:30 PM	10.5
Bobby Chambers	6:30 AM	5:30 PM	10.5
Ken Walker	6:30 AM	5:30 PM	10.5
Doug Graff	6:30 AM	5:30 PM	10.5
Doug Beare	6:30 AM	5:30 PM	10.5
165 Personnel			
Nick Keagel	7:00 AM	5:30 PM	10
Leroy Richardson	7:00 AM	5:30 PM	10

Equipment			
Description	**Mob Date**	**Demob Date**	**Hours**
Komatsu PC 300	7/12/2005		10
Cat 950G	7/15/2005		0
Cat D5	7/15/2005		10
John Deere 300D	7/18/2005	10/26/2005	0
Finlay Screen	7/19/2005	9/20/2005	0
Volvo 240	7/25/2005		10
Volvo 240	8/2/2005		10
John Deere 250	8/22/2005		10
John Deere 250	10/14/2005		0
John Deere 250	10/21/2005		10

Entact Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verafied)	Problem / Delays / Changes
1. Mobilization	0.0%	100.0%	100.0%	
2. Site Setup	0.0%	100.0%	100.0%	
3. Utility location	0.0%	100.0%	100.0%	
4. Clear and grub	0.0%	82.0%	82.0%	The remainder of the clearing will be completed as the LSD is stabilized and we can get to the east side of the ditch.
5. Lower South Ditch Stabilize and Consolidate	0.0%	82.2%	0.0%	
6. Lower South Ditch Hot Spots	0.0%	110.0%	110.0%	Loaded out additional treated material
7. South Ditch	0.0%	65.0%	0.0%	
8. South Borrow Waste Pile	0.0%	140.0%	0.0%	Treating additional material
9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping)	0.0%	100.0%	0.0%	
10. Stained Soil Area	0.0%	100.0%	0.0%	
11. Site Restoration	0.0%	0.0%	0.0%	
12. Demobilization	0.0%	0.0%	0.0%	
13. North Ditch Staging Area	2.0%	5.0%	0.0%	In-situ treatment with TSP
Sub-Contractor Progress	**QTY Today(est)**	**Cumulative QTY(est)**	**Cumulative QTY(Verafied)**	**Problem / Delays / Changes**
Relocate Buffer tanks	0%	100%	0%	
	0%	0%	0%	
	0%	0%	0%	

Material Delivery	
Description	**Qty.**

Weather Conditions	
Temp.	29
Wind	calm
Precip	T/snow

Other (note equipment delivery and pickup here)

Description of Work Performed

Entact is Pumping water out of LSD . Entact is screening soil conditioner and hauling it to the roll off box yard to stockpile for use at a later time. Entact begins in-situ treating material in NDSA.

Completed By: Brent Hays

ENTACT Services, LLC — Daily Project Summary

Date 1/24/2006

Project Name: Keystone
Project Location: Bartonville, IL.
Customer: Keystone Wire & Steel
ENTACT Project #: D-1154

Entact Personnel			
Name	**Start Time**	**Finish Time**	**Hours**
Brent Hays	6:30 AM	5:30 PM	10.5
Aaron McCorvey	6:30 AM	5:30 PM	10.5
649 Personnel			
Todd Shreves	6:30 AM	5:30 PM	10.5
Tony Erickson	6:30 AM	5:30 PM	10.5
James Stout	6:30 AM	5:30 PM	10.5
James Schmitt	6:30 AM	5:30 PM	10.5
Bobby Chambers	6:30 AM	5:30 PM	10.5
Ken Walker	6:30 AM	5:30 PM	10.5
Doug Graff	6:30 AM	5:30 PM	10.5
Doug Beare	6:30 AM	5:30 PM	10.5
165 Personnel			
Nick Keagel	7:00 AM	5:30 PM	10
Leroy Richardson	7:00 AM	5:30 PM	10

Equipment			
Description	**Mob Date**	**Demob Date**	**Hours**
Komatsu PC 300	7/12/2005		10
Cat 950G	7/15/2005		0
Cat D5	7/15/2005		10
John Deere 300D	7/18/2005	10/26/2005	0
Finlay Screen	7/19/2005	9/20/2005	0
Volvo 240	7/25/2005		10
Volvo 240	8/2/2005		10
John Deere 250	8/22/2005		10
John Deere 250	10/14/2005		0
John Deere 250	10/21/2005		10

Entact Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verafied)	Problem / Delays / Changes
1. Mobilization	0.0%	100.0%	100.0%	
2. Site Setup	0.0%	100.0%	100.0%	
3. Utility location	0.0%	100.0%	100.0%	
4. Clear and grub	0.0%	82.0%	82.0%	The remainder of the clearing will be completed as the LSD is stabilized and we can get to the east side of the ditch.
5. Lower South Ditch Stabilize and Consolidate	0.0%	82.2%	0.0%	
6. Lower South Ditch Hot Spots	0.0%	110.0%	110.0%	Loaded out additional treated material
7. South Ditch	3.0%	68.0%	0.0%	
8. South Borrow Waste Pile	0.0%	140.0%	0.0%	Treating additional material
9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping)	0.0%	100.0%	0.0%	
10. Stained Soil Area	0.0%	100.0%	0.0%	
11. Site Restoration	0.0%	0.0%	0.0%	
12. Demobilization	0.0%	0.0%	0.0%	
13. North Ditch Staging Area	3.0%	8.0%	0.0%	In-situ treatment with TSP
Sub-Contractor Progress	**QTY Today(est)**	**Cumulative QTY(est)**	**Cumulative QTY(Verafied)**	**Problem / Delays / Changes**
Relocate Buffer tanks	0%	100%	0%	
	0%	0%	0%	
	0%	0%	0%	

Material Delivery	
Description	**Qty.**
TSP	25 tons

Weather Conditions	
Temp.	37
Wind	calm
Precip	T/snow

Other (note equipment delivery and pickup here)

Description of Work Performed

Entact is pumping water out of LSD. Entact is screening soil conditioner and hauling it to the roll off box yard to stockpile for use at a later time. Entact continues in-situ treatment of material in NDSA with TSP.

Completed By: Brent Hays

ENTACT Services, LLC — Daily Project Summary

Date 1/25/2006

Project Name: Keystone
Project Location: Bartonville, IL.
Customer: Keystone Wire & Steel
ENTACT Project #: D-1154

Entact Personnel			
Name	**Start Time**	**Finish Time**	**Hours**
Brent Hays	6:30 AM	5:30 PM	10.5
Aaron McCorvey	6:30 AM	5:30 PM	10.5
649 Personnel			
Todd Shreves	6:30 AM	5:30 PM	10.5
Tony Erickson	6:30 AM	5:30 PM	10.5
James Stout	6:30 AM	5:30 PM	10.5
James Schmitt	6:30 AM	5:30 PM	10.5
Bobby Chambers	6:30 AM	5:30 PM	10.5
Ken Walker	6:30 AM	5:30 PM	10.5
Doug Graff	6:30 AM	5:30 PM	10.5
Doug Beare	6:30 AM	5:30 PM	10.5
165 Personnel			
Nick Keagel	7:00 AM	5:30 PM	10
Leroy Richardson	7:00 AM	5:30 PM	10

Equipment			
Description	**Mob Date**	**Demob Date**	**Hours**
Komatsu PC 300	7/12/2005		10
Cat 950G	7/15/2005		0
Cat D5	7/15/2005		10
John Deere 300D	7/18/2005	10/26/2005	0
Finlay Screen	7/19/2005	9/20/2005	0
Volvo 240	7/25/2005		10
Volvo 240	8/2/2005		10
John Deere 250	8/22/2005		10
John Deere 250	10/14/2005		0
John Deere 250	10/21/2005		10

Entact Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verafied)	Problem / Delays / Changes
1. Mobilization	0.0%	100.0%	100.0%	
2. Site Setup	0.0%	100.0%	100.0%	
3. Utility location	0.0%	100.0%	100.0%	
4. Clear and grub	0.0%	82.0%	82.0%	The remainder of the clearing will be completed as the LSD is stabilized and we can get to the east side of the ditch.
5. Lower South Ditch Stabilize and Consolidate	0.1%	82.3%	0.0%	
6. Lower South Ditch Hot Spots	0.0%	110.0%	110.0%	Loaded out additional treated material
7. South Ditch	3.0%	71.0%	0.0%	
8. South Borrow Waste Pile	0.0%	140.0%	0.0%	Treating additional material
9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping)	0.0%	100.0%	0.0%	
10. Stained Soil Area	0.0%	100.0%	0.0%	
11. Site Restoration	0.0%	0.0%	0.0%	
12. Demobilization	0.0%	0.0%	0.0%	
13. North Ditch Staging Area	1.0%	9.0%	0.0%	Collect characterization samples
Sub-Contractor Progress	**QTY Today(est)**	**Cumulative QTY(est)**	**Cumulative QTY(Verafied)**	**Problem / Delays / Changes**
Relocate Buffer tanks	0%	100%	0%	
	0%	0%	0%	
	0%	0%	0%	

Material Delivery	
Description	**Qty.**

Weather Conditions	
Temp.	30
Wind	calm
Precip	T/snow

Other (note equipment delivery and pickup here)

Description of Work Performed

Entact is pumping water out of LSD. Entact is screening soil conditioner and hauling it to the roll off box yard to stockpile for use at a later time. Entact collects characterization samples in NDSA and send to PDC lab. Entact is loading out S. Ditch material and sending to PDC for disposal. Begin stabilizing and consolidating in LSD again.

Completed By: Brent Hays

ENTACT Services, LLC — Daily Project Summary

Date: 1/27/2006

Project Name: Keystone
Project Location: Bartonville, IL.
Customer: Keystone Wire & Steel
ENTACT Project #: D-1154

Entact Personnel			
Name	**Start Time**	**Finish Time**	**Hours**
Brent Hays	6:30 AM	5:30 PM	10.5
Aaron McCorvey	6:30 AM	5:30 PM	10.5
649 Personnel			
Todd Shreves	6:30 AM	5:30 PM	10.5
Tony Erickson	6:30 AM	5:30 PM	10.5
James Stout	6:30 AM	5:30 PM	10.5
James Schmitt	6:30 AM	5:30 PM	10.5
Bobby Chambers	6:30 AM	5:30 PM	10.5
Ken Walker	6:30 AM	5:30 PM	10.5
Doug Graff	6:30 AM	5:30 PM	10.5
Doug Beare	6:30 AM	5:30 PM	10.5
165 Personnel			
Nick Keagel	7:00 AM	5:30 PM	10
Leroy Richardson	7:00 AM	5:30 PM	10

Equipment			
Description	**Mob Date**	**Demob Date**	**Hours**
Komatsu PC 300	7/12/2005		10
Cat 950G	7/15/2005		0
Cat D5	7/15/2005		10
John Deere 300D	7/18/2005	10/26/2005	0
Finlay Screen	7/19/2005	9/20/2005	0
Volvo 240	7/25/2005		10
Volvo 240	8/2/2005		10
John Deere 250	8/22/2005		10
John Deere 250	10/14/2005		0
John Deere 250	10/21/2005		10

Entact Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verified)	Problem / Delays / Changes
1. Mobilization	0.0%	100.0%	100.0%	
2. Site Setup	0.0%	100.0%	100.0%	
3. Utility location	0.0%	100.0%	100.0%	
4. Clear and grub	0.0%	82.0%	82.0%	The remainder of the clearing will be completed as the LSD is stabilized and we can get to the east side of the ditch.
5. Lower South Ditch Stabilize and Consolidate	0.1%	82.5%	0.0%	
6. Lower South Ditch Hot Spots	0.0%	110.0%	110.0%	Loaded out additional treated material
7. South Ditch	3.0%	77.0%	0.0%	
8. South Borrow Waste Pile	0.0%	140.0%	0.0%	Treating additional material
9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping)	0.0%	100.0%	0.0%	
10. Stained Soil Area	0.0%	100.0%	0.0%	
11. Site Restoration	0.0%	0.0%	0.0%	
12. Demobilization	0.0%	0.0%	0.0%	
13. North ditch staging area	1.0%	10.0%	0.0%	Receive post treatment samples results. All results meet disposal requirements.

Sub-Contractor Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verified)	Problem / Delays / Changes
Relocate Buffer tanks	0%	100%	0%	
	0%	0%	0%	
	0%	0%	0%	

Material Delivery	
Description	**Qty.**

Weather Conditions	
Temp.	44
Wind	calm
Precip	T/snow

Other (note equipment delivery and pickup here)

Description of Work Performed

Entact is pumping water out of LSD and the S. Ditch. Entact is screening soil conditioner and hauling it to the LSD. Entact is loading out S. Ditch material and sending to PDC for disposal. Continue stabilizing and consolidating the LSD. Entact receives characterization results for the NDSA. All material meets disposal requirements.

Completed By: Brent Hays

ENTACT Services, LLC — Daily Project Summary

Date 1/30/2006

Project Name: Keystone
Project Location: Bartonville, IL.
Customer: Keystone Wire & Steel
ENTACT Project #: D-1154

Entact Personnel			
Name	**Start Time**	**Finish Time**	**Hours**
Brent Hays	6:30 AM	5:30 PM	10.5
Aaron McCorvey	6:30 AM	5:30 PM	10.5
649 Personnel			
Todd Shreves	6:30 AM	5:30 PM	10.5
Tony Erickson	6:30 AM	5:30 PM	10.5
James Stout	6:30 AM	5:30 PM	10.5
James Schmitt	6:30 AM	5:30 PM	10.5
Bobby Chambers	6:30 AM	5:30 PM	10.5
Ken Walker	6:30 AM	5:30 PM	10.5
Doug Graff	6:30 AM	5:30 PM	10.5
Doug Beare	6:30 AM	5:30 PM	10.5
165 Personnel			
Nick Keagel	7:00 AM	5:30 PM	10
Leroy Richardson	7:00 AM	5:30 PM	10

Equipment			
Description	**Mob Date**	**Demob Date**	**Hours**
Komatsu PC 300	7/12/2005		10
Cat 950G	7/15/2005		0
Cat D5	7/15/2005		10
John Deere 300D	7/18/2005	10/26/2005	0
Finlay Screen	7/19/2005	9/20/2005	0
Volvo 240	7/25/2005		10
Volvo 240	8/2/2005		10
John Deere 250	8/22/2005		10
John Deere 250	10/14/2005		0
John Deere 250	10/21/2005		10

Entact Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verafied)	Problem / Delays / Changes
1. Mobilization	0.0%	100.0%	100.0%	
2. Site Setup	0.0%	100.0%	100.0%	
3. Utility location	0.0%	100.0%	100.0%	
4. Clear and grub	0.0%	82.0%	82.0%	The remainder of the clearing will be completed as the LSD is stabilized and we can get to the east side of the ditch.
5. Lower South Ditch Stabilize and Consolidate	0.1%	82.6%	0.0%	
6. Lower South Ditch Hot Spots	0.0%	110.0%	110.0%	Loaded out additional treated material
7. South Ditch	3.0%	80.0%	0.0%	
8. South Borrow Waste Pile	0.0%	140.0%	0.0%	Treating additional material
9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping)	0.0%	100.0%	0.0%	
10. Stained Soil Area	0.0%	100.0%	0.0%	
11. Site Restoration	0.0%	0.0%	0.0%	
12. Demobilization	0.0%	0.0%	0.0%	
13. North ditch staging area	5.0%	15.0%	0.0%	Begin loading out material to Tazwell County RDF for disposal.
Sub-Contractor Progress	**QTY Today(est)**	**Cumulative QTY(est)**	**Cumulative QTY(Verafied)**	**Problem / Delays / Changes**
Relocate Buffer tanks	0%	100%	0%	
	0%	0%	0%	
	0%	0%	0%	

Material Delivery	
Description	**Qty.**

Weather Conditions	
Temp.	36
Wind	calm
Precip	T/snow

Other (note equipment delivery and pickup here)

Description of Work Performed

Entact is pumping water out of LSD and the S. Ditch. Entact is screening soil conditioner and hauling it to the LSD. Entact is loading out S. Ditch material and sending to PDC for disposal. Continue stabilizing and consolidating the LSD. Entact begins loading out NDSA and sending to Tazwell County RDF for disposal.

Completed By: Brent Hays

ENTACT Services, LLC — Daily Project Summary

Date: 1/31/2006

Project Name: Keystone
Project Location: Bartonville, IL
Customer: Keystone Wire & Steel
ENTACT Project #: D-1154

Entact Personnel			
Name	**Start Time**	**Finish Time**	**Hours**
Brent Hays	6:30 AM	5:30 PM	10.5
Aaron McCorvey	6:30 AM	5:30 PM	10.5
649 Personnel			
Todd Shreves	6:30 AM	5:30 PM	10.5
Tony Erickson	6:30 AM	5:30 PM	10.5
James Stout	6:30 AM	5:30 PM	10.5
James Schmitt	6:30 AM	5:30 PM	10.5
Bobby Chambers	6:30 AM	5:30 PM	10.5
Ken Walker	6:30 AM	5:30 PM	10.5
Doug Graff	6:30 AM	5:30 PM	10.5
Doug Beare	6:30 AM	5:30 PM	10.5
165 Personnel			
Nick Keagel	7:00 AM	5:30 PM	10
Leroy Richardson	7:00 AM	5:30 PM	10

Equipment			
Description	**Mob Date**	**Demob Date**	**Hours**
Komatsu PC 300	7/12/2005		10
Cat 950G	7/15/2005		0
Cat D5	7/15/2005		10
John Deere 300D	7/18/2005	10/26/2005	0
Finlay Screen	7/19/2005	9/20/2005	0
Volvo 240	7/25/2005		10
Volvo 240	8/2/2005		10
John Deere 250	8/22/2005		10
John Deere 250	10/14/2005		0
John Deere 250	10/21/2005		10

Entact Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verified)	Problem / Delays / Changes
1. Mobilization	0.0%	100.0%	100.0%	
2. Site Setup	0.0%	100.0%	100.0%	
3. Utility location	0.0%	100.0%	100.0%	
4. Clear and grub	0.0%	82.0%	82.0%	The remainder of the clearing will be completed as the LSD is stabilized and we can get to the east side of the ditch.
5. Lower South Ditch Stabilize and Consolidate	0.1%	82.7%	0.0%	
6. Lower South Ditch Hot Spots	0.0%	110.0%	110.0%	Loaded out additional treated material
7. South Ditch	3.0%	83.0%	0.0%	
8. South Borrow Waste Pile	0.0%	140.0%	0.0%	Treating additional material
9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping)	0.0%	100.0%	0.0%	
10. Stained Soil Area	0.0%	100.0%	0.0%	
11. Site Restoration	0.0%	0.0%	0.0%	
12. Demobilization	0.0%	0.0%	0.0%	
13. North ditch staging area	5.0%	20.0%	0.0%	Continue loading out material to Tazwell County RDF for disposal.

Sub-Contractor Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verified)	Problem / Delays / Changes
Relocate Buffer tanks	0%	100%	0%	
	0%	0%	0%	
	0%	0%	0%	

Material Delivery	
Description	**Qty.**

Weather Conditions	
Temp.	35
Wind	calm
Precip	

Other (note equipment delivery and pickup here)

Description of Work Performed

Entact is pumping water out of LSD and the S. Ditch. Entact is screening soil conditioner and hauling it to the LSD. Entact is loading out S. Ditch material and sending to PDC for disposal. Continue stabilizing and consolidating the LSD. Entact continues loading out NDSA and sending to Tazwell County RDF for disposal.

Completed By: Brent Hays

ENTACT Services, LLC — Daily Project Summary

Date 2/1/2006

Project Name: Keystone
Project Location: Bartonville, IL.
Customer: Keystone Wire & Steel
ENTACT Project #: D-1154

Entact Personnel			
Name	**Start Time**	**Finish Time**	**Hours**
Brent Hays	6:30 AM	5:30 PM	10.5
Aaron McCorvey	6:30 AM	5:30 PM	10.5
649 Personnel			
Todd Shreves	6:30 AM	5:30 PM	10.5
Tony Erickson	6:30 AM	5:30 PM	10.5
James Stout	6:30 AM	5:30 PM	10.5
James Schmitt	6:30 AM	5:30 PM	10.5
Bobby Chambers	6:30 AM	5:30 PM	10.5
Ken Walker	6:30 AM	5:30 PM	10.5
Doug Graff	6:30 AM	5:30 PM	10.5
Doug Beare	6:30 AM	5:30 PM	10.5
165 Personnel			
Nick Keagel	7:00 AM	5:30 PM	10
Leroy Richardson	7:00 AM	5:30 PM	10

Equipment			
Description	**Mob Date**	**Demob Date**	**Hours**
Komatsu PC 300	7/12/2005		10
Cat 950G	7/15/2005		0
Cat D5	7/15/2005		10
John Deere 300D	7/18/2005	10/26/2005	0
Finlay Screen	7/19/2005	9/20/2005	0
Volvo 240	7/25/2005		10
Volvo 240	8/2/2005		10
John Deere 250	8/22/2005		10
John Deere 250	10/14/2005		0
John Deere 250	10/21/2005		10

Entact Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verified)	Problem / Delays / Changes
1. Mobilization	0.0%	100.0%	100.0%	
2. Site Setup	0.0%	100.0%	100.0%	
3. Utility location	0.0%	100.0%	100.0%	
4. Clear and grub	0.0%	82.0%	82.0%	The remainder of the clearing will be completed as the LSD is stabilized and we can get to the east side of the ditch.
5. Lower South Ditch Stabilize and Consolidate	0.1%	82.8%	0.0%	
6. Lower South Ditch Hot Spots	0.0%	110.0%	110.0%	Loaded out additional treated material
7. South Ditch	3.0%	86.0%	0.0%	
8. South Borrow Waste Pile	0.0%	140.0%	0.0%	Treating additional material
9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping)	0.0%	100.0%	0.0%	
10. Stained Soil Area	0.0%	100.0%	0.0%	
11. Site Restoration	0.0%	0.0%	0.0%	
12. Demobilization	0.0%	0.0%	0.0%	
13. North ditch staging area	5.0%	25.0%	0.0%	Continue loading out material to Tazwell County RDF for disposal.

Sub-Contractor Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verified)	Problem / Delays / Changes
Relocate Buffer tanks	0%	100%	0%	
	0%	0%	0%	
	0%	0%	0%	

Material Delivery	
Description	**Qty.**

Weather Conditions	
Temp.	38
Wind	calm
Precip	

Other (note equipment delivery and pickup here)

Description of Work Performed

Entact is pumping water out of LSD and the S. Ditch. Entact is screening soil conditioner and hauling it to the LSD. Entact is loading out S. Ditch material and sending to PDC for disposal. Continue stabilizing and consolidating the LSD.. Entact continues loading out NDSA and sending material to Tazwell County RDF for disposal.

Completed By: Brent Hays

ENTACT Services, LLC

Date 2/2/2006

Daily Project Summary

Project Name: Keystone
Customer: Keystone Wire & Steel
Project Location: Bartonville, IL.
ENTACT Project #: D-1154

Entact Personnel			
Name	**Start Time**	**Finish Time**	**Hours**
Brent Hays	6:30 AM	5:30 PM	10.5
Aaron McCorvey	6:30 AM	5:30 PM	10.5
649 Personnel			
Todd Shreves	6:30 AM	5:30 PM	10.5
Tony Erickson	6:30 AM	5:30 PM	10.5
James Stout	6:30 AM	5:30 PM	10.5
James Schmitt	6:30 AM	5:30 PM	10.5
Bobby Chambers	6:30 AM	5:30 PM	10.5
Ken Walker	6:30 AM	5:30 PM	10.5
Doug Graff	6:30 AM	5:30 PM	10.5
Doug Beare	6:30 AM	5:30 PM	10.5
165 Personnel			
Nick Keagel	7:00 AM	5:30 PM	10
Leroy Richardson	7:00 AM	5:30 PM	10

Equipment			
Description	**Mob Date**	**Demob Date**	**Hours**
Komatsu PC 300	7/12/2005		10
Cat 950G	7/15/2005		0
Cat D5	7/15/2005		10
John Deere 300D	7/18/2005	10/26/2005	0
Finlay Screen	7/19/2005	9/20/2005	0
Volvo 240	7/25/2005		10
Volvo 240	8/2/2005		10
John Deere 250	8/22/2005		10
John Deere 250	10/14/2005		0
John Deere 250	10/21/2005		10

Entact Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verafied)	Problem / Delays / Changes
1. Mobilization	0.0%	100.0%	100.0%	
2. Site Setup	0.0%	100.0%	100.0%	
3. Utility location	0.0%	100.0%	100.0%	
4. Clear and grub	0.0%	82.0%	82.0%	The remainder of the clearing will be completed as the LSD is stabilized and we can get to the east side of the ditch.
5. Lower South Ditch Stabilize and Consolidate	0.1%	82.9%	0.0%	
6. Lower South Ditch Hot Spots	0.0%	110.0%	110.0%	Loaded out additional treated material
7. South Ditch	1.0%	87.0%	0.0%	
8. South Borrow Waste Pile	0.0%	140.0%	0.0%	Treating additional material
9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping)	0.0%	100.0%	0.0%	
10. Stained Soil Area	0.0%	100.0%	0.0%	
11. Site Restoration	0.0%	0.0%	0.0%	
12. Demobilization	0.0%	0.0%	0.0%	
13. North ditch staging area	5.0%	30.0%	0.0%	Collect post-excavation confirmation samples and send to PDC lab.
Sub-Contractor Progress	**QTY Today(est)**	**Cumulative QTY(est)**	**Cumulative QTY(Verafied)**	**Problem / Delays / Changes**
Relocate Buffer tanks	0%	100%	0%	
	0%	0%	0%	
	0%	0%	0%	

Material Delivery	
Description	**Qty.**

Weather Conditions	
Temp.	35
Wind	calm
Precip	.01in

Other (note equipment delivery and pickup here)

Description of Work Performed

Entact is pumping water out of LSD and the S. Ditch. Entact is screening soil conditioner and hauling it to the LSD. Entact finishes loading out NDSA and collects post-excavation confirmation samples and send to PDC lab. Continue stabilizing and consolidating the LSD. Entact stops loading S. Ditch material to do final consolidation and take additional post-treatment samples and send to PDC lab.

Completed By: Brent Hays

ENTACT Services, LLC

Date 2/8/2006

Daily Project Summary

Project Name: Keystone
Project Location: Bartonville, IL.
Customer: Keystone Wire & Steel
ENTACT Project #: D-1154

Entact Personnel

Name	Start Time	Finish Time	Hours
Brent Hays	6:30 AM	5:30 PM	10.5
Aaron McCorvey	6:30 AM	5:30 PM	10.5
649 Personnel			
Todd Shreves	6:30 AM	5:30 PM	10.5
Tony Erickson	6:30 AM	5:30 PM	10.5
James Stout	6:30 AM	5:30 PM	10.5
James Schmitt	6:30 AM	5:30 PM	10.5
Bobby Chambers	6:30 AM	5:30 PM	10.5
Ken Walker	6:30 AM	5:30 PM	10.5
Doug Graff	6:30 AM	5:30 PM	10.5
Doug Beare	6:30 AM	5:30 PM	10.5
165 Personnel			
Nick Keagel	7:00 AM	5:30 PM	10
Leroy Richardson	7:00 AM	5:30 PM	10

Equipment

Description	Mob Date	Demob Date	Hours
Komatsu PC 300	7/12/2005		10
Cat 950G	7/15/2005		0
Cat D5	7/15/2005		10
John Deere 300D	7/18/2005	10/26/2005	0
Finlay Screen	7/19/2005	9/20/2005	0
Volvo 240	7/25/2005		10
Volvo 240	8/2/2005		10
John Deere 250	8/22/2005		10
John Deere 250	10/14/2005		0
John Deere 250	10/21/2005		10

Entact Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verafied)	Problem / Delays / Changes
1. Mobilization	0.0%	100.0%	100.0%	
2. Site Setup	0.0%	100.0%	100.0%	
3. Utility location	0.0%	100.0%	100.0%	
4. Clear and grub	0.0%	82.0%	82.0%	The remainder of the clearing will be completed as the LSD is stabilized and we can get to the east side of the ditch.
5. Lower South Ditch Stabilize and Consolidate	0.1%	83.3%	0.0%	
6. Lower South Ditch Hot Spots	0.0%	110.0%	110.0%	Loaded out additional treated material
7. South Ditch	1.0%	88.0%	0.0%	
8. South Borrow Waste Pile	0.0%	140.0%	0.0%	Treating additional material
9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping)	0.0%	100.0%	0.0%	
10. Stained Soil Area	0.0%	100.0%	0.0%	
11. Site Restoration	0.0%	0.0%	0.0%	
12. Demobilization	0.0%	0.0%	0.0%	
13. North ditch staging area	1.0%	31.0%	0.0%	Receive post-excavation confirmation sample results.

Sub-Contractor Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verafied)	Problem / Delays / Changes
Relocate Buffer tanks	0%	100%	0%	
	0%	0%	0%	
	0%	0%	0%	

Material Delivery		Weather Conditions		Other (note equipment delivery and pickup here)
Description	Qty.	Temp.	28	
		Wind	calm	
		Precip		

Description of Work Performed

Entact is pumping water out of LSD and the S. Ditch. Entact is screening soil conditioner and hauling it to the LSD. Continue stabilizing and consolidating the LSD. Jenny Elste begins sampling areas outside the SBAWP. Entact receives post-treatment results for the S. Ditch and continues sending material to PDC for disposal. Entact also receives the post-excavation results for the NDSA and further in-situ treatment/excavation will be required.

Completed By: Brent Hays

ENTACT Services, LLC

Date 2/10/2006

Daily Project Summary

Project Name: Keystone
Project Location: Bartonville, IL.
Customer: Keystone Wire & Steel
ENTACT Project #: D-1154

Entact Personnel			
Name	**Start Time**	**Finish Time**	**Hours**
Brent Hays	6:30 AM	5:30 PM	10.5
Aaron McCorvey	6:30 AM	5:30 PM	10.5
649 Personnel			
Todd Shreves	6:30 AM	5:30 PM	10.5
Tony Erickson	6:30 AM	5:30 PM	10.5
James Stout	6:30 AM	5:30 PM	10.5
James Schmitt	6:30 AM	5:30 PM	10.5
Bobby Chambers	6:30 AM	5:30 PM	10.5
Ken Walker	6:30 AM	5:30 PM	10.5
Doug Graff	6:30 AM	5:30 PM	10.5
Doug Beare	6:30 AM	5:30 PM	10.5
165 Personnel			
Nick Keagel	7:00 AM	5:30 PM	10
Leroy Richardson	7:00 AM	5:30 PM	10

Equipment			
Description	**Mob Date**	**Demob Date**	**Hours**
Komatsu PC 300	7/12/2005		10
Cat 950G	7/15/2005		0
Cat D5	7/15/2005		10
John Deere 300D	7/18/2005	10/26/2005	0
Finlay Screen	7/19/2005	9/20/2005	0
Volvo 240	7/25/2005		10
Volvo 240	8/2/2005		10
John Deere 250	8/22/2005		10
John Deere 250	10/14/2005		0
John Deere 250	10/21/2005		10

Entact Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verafied)	Problem / Delays / Changes
1. Mobilization	0.0%	100.0%	100.0%	
2. Site Setup	0.0%	100.0%	100.0%	
3. Utility location	0.0%	100.0%	100.0%	
4. Clear and grub	0.0%	82.0%	82.0%	The remainder of the clearing will be completed as the LSD is stabilized and we can get to the east side of the ditch.
5. Lower South Ditch Stabilize and Consolidate	0.1%	83.5%	0.0%	
6. Lower South Ditch Hot Spots	0.0%	110.0%	110.0%	Loaded out additional treated material
7. South Ditch	1.0%	89.0%	0.0%	
8. South Borrow Waste Pile	0.0%	140.0%	0.0%	Treating additional material
9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping)	0.0%	100.0%	0.0%	
10. Stained Soil Area	0.0%	100.0%	0.0%	
11. Site Restoration	0.0%	0.0%	0.0%	
12. Demobilization	0.0%	0.0%	0.0%	
13. North ditch staging area	5.0%	36.0%	0.0%	Continue in-situ treatment

Sub-Contractor Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verafied)	Problem / Delays / Changes
Relocate Buffer tanks	0%	100%	0%	
	0%	0%	0%	
	0%	0%	0%	

Material Delivery	
Description	**Qty.**

Weather Conditions	
Temp.	33
Wind	calm
Precip	T rain

Other (note equipment delivery and pickup here)

Description of Work Performed

Entact is pumping water out of LSD and the S. Ditch. Entact is screening soil conditioner and hauling it to the LSD. Continue stabilizing and consolidating the LSD. Continue loading out S. Ditch and sending to PDC for disposal. Continue in-situ treatment in NDSA.

Completed By: Brent Hays

ENTACT Services, LLC — Daily Project Summary

Date 2/13/2006

Project Name: Keystone
Project Location: Bartonville, IL.
Customer: Keystone Wire & Steel
ENTACT Project #: D-1154

Entact Personnel			
Name	**Start Time**	**Finish Time**	**Hours**
Brent Hays	6:30 AM	5:30 PM	10.5
Aaron McCorvey	6:30 AM	5:30 PM	10.5
649 Personnel			
Todd Shreves	6:30 AM	5:30 PM	10.5
Tony Erickson	6:30 AM	5:30 PM	10.5
James Stout	6:30 AM	5:30 PM	10.5
James Schmitt	6:30 AM	5:30 PM	10.5
Bobby Chambers	6:30 AM	5:30 PM	10.5
Ken Walker	6:30 AM	5:30 PM	10.5
Doug Graff	6:30 AM	5:30 PM	10.5
Doug Beare	6:30 AM	5:30 PM	10.5
165 Personnel			
Nick Keagel	7:00 AM	5:30 PM	10
Leroy Richardson	7:00 AM	5:30 PM	10

Equipment			
Description	**Mob Date**	**Demob Date**	**Hours**
Komatsu PC 300	7/12/2005		10
Cat 950G	7/15/2005		0
Cat D5	7/15/2005		10
John Deere 300D	7/18/2005	10/26/2005	0
Finlay Screen	7/19/2005	9/20/2005	0
Volvo 240	7/25/2005		10
Volvo 240	8/2/2005		10
John Deere 250	8/22/2005		10
John Deere 250	10/14/2005		0
John Deere 250	10/21/2005		10

Entact Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verified)	Problem / Delays / Changes
1. Mobilization	0.0%	100.0%	100.0%	
2. Site Setup	0.0%	100.0%	100.0%	
3. Utility location	0.0%	100.0%	100.0%	
4. Clear and grub	0.0%	82.0%	82.0%	The remainder of the clearing will be completed as the LSD is stabilized and we can get to the east side of the ditch.
5. Lower South Ditch Stabilize and Consolidate	0.1%	83.6%	0.0%	
6. Lower South Ditch Hot Spots	0.0%	110.0%	110.0%	Loaded out additional treated material
7. South Ditch	0.0%	89.0%	0.0%	
8. South Borrow Waste Pile	0.0%	140.0%	0.0%	Treating additional material
9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping)	0.0%	100.0%	0.0%	
10. Stained Soil Area	0.0%	100.0%	0.0%	
11. Site Restoration	0.0%	0.0%	0.0%	
12. Demobilization	0.0%	0.0%	0.0%	
13. North ditch staging area	5.0%	41.0%	0.0%	Continue in-situ treatment.

Sub-Contractor Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verified)	Problem / Delays / Changes
Relocate Buffer tanks	0%	100%	0%	
	0%	0%	0%	
	0%	0%	0%	

Material Delivery	
Description	**Qty.**

Weather Conditions	
Temp.	29
Wind	calm
Precip	

Other (note equipment delivery and pickup here)

Description of Work Performed

Entact is pumping water out of LSD and the S. Ditch. Entact is screening soil conditioner and hauling it to the LSD. Continue stabilizing and consolidating the LSD. Continue in-situ treatment in NDSA.

Completed By: Brent Hays

ENTACT Services, LLC

Date 2/14/2006

Daily Project Summary

Project Name: Keystone
Project Location: Bartonville, IL.
Customer: Keystone Wire & Steel
ENTACT Project #: D-1154

Entact Personnel

Name	Start Time	Finish Time	Hours
Brent Hays	6:30 AM	5:30 PM	10.5
Aaron McCorvey	6:30 AM	5:30 PM	10.5
649 Personnel			
Todd Shreves	6:30 AM	5:30 PM	10.5
Tony Erickson	6:30 AM	5:30 PM	10.5
James Stout	6:30 AM	5:30 PM	10.5
James Schmitt	6:30 AM	5:30 PM	10.5
Bobby Chambers	6:30 AM	5:30 PM	10.5
Ken Walker	6:30 AM	5:30 PM	10.5
Doug Graff	6:30 AM	5:30 PM	10.5
Doug Beare	6:30 AM	5:30 PM	10.5
165 Personnel			
Nick Keagel	7:00 AM	5:30 PM	10
Leroy Richardson	7:00 AM	5:30 PM	10

Equipment

Description	Mob Date	Demob Date	Hours
Komatsu PC 300	7/12/2005		10
Cat 950G	7/15/2005		0
Cat D5	7/15/2005		10
John Deere 300D	7/18/2005	10/26/2005	0
Finlay Screen	7/19/2005	9/20/2005	0
Volvo 240	7/25/2005		10
Volvo 240	8/2/2005		10
John Deere 250	8/22/2005		10
John Deere 250	10/14/2005		0
John Deere 250	10/21/2005		10

Entact Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verafied)	Problem / Delays / Changes
1. Mobilization	0.0%	100.0%	100.0%	
2. Site Setup	0.0%	100.0%	100.0%	
3. Utility location	0.0%	100.0%	100.0%	
4. Clear and grub	0.0%	82.0%	82.0%	The remainder of the clearing will be completed as the LSD is stabilized and we can get to the east side of the ditch.
5. Lower South Ditch Stabilize and Consolidate	0.1%	83.7%	0.0%	
6. Lower South Ditch Hot Spots	0.0%	110.0%	110.0%	Loaded out additional treated material
7. South Ditch	1.0%	90.0%	0.0%	
8. South Borrow Waste Pile	0.0%	140.0%	0.0%	Treating additional material
9. Infrastructure Modifications (Buffer tanks, Steam Line, Piping)	0.0%	100.0%	0.0%	
10. Stained Soil Area	0.0%	100.0%	0.0%	
11. Site Restoration	0.0%	0.0%	0.0%	
12. Demobilization	0.0%	0.0%	0.0%	
13. North ditch staging area	5.0%	46.0%	0.0%	Continue in-situ treatment.

Sub-Contractor Progress	QTY Today(est)	Cumulative QTY(est)	Cumulative QTY(Verafied)	Problem / Delays / Changes
Relocate Buffer tanks	0%	100%	0%	
	0%	0%	0%	
	0%	0%	0%	

Material Delivery		Weather Conditions		Other (note equipment delivery and pickup here)
Description	Qty.	Temp.	42	
		Wind	calm	
		Precip		

Description of Work Performed

Entact is pumping water out of LSD and the S. Ditch. Entact is screening soil conditioner and hauling it to the LSD. Continue stabilizing and consolidating the LSD. Continue in-situ treatment in NDSA. Collect post-excavation confirmation samples in the S. Ditch and send to PDC lab.

Completed By: Brent Hays

ENTACT®
environmental services

3129 Bass Pro Drive
Grapevine, Texas
76051

March 8, 2006

Mr. Jonathan Adenuga
U.S. EPA Region 5, DE-9J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3507

RE: Keystone Steel & Wire Company
7000 SW Adams Street, Peoria, Illinois

Dear Jonathan:

On behalf of the Keystone Steel & Wire Company, ENTACT Services LLC (ENTACT) is transmitting the attached responses to the U.S. Environmental Protection Agency's (U.S. EPA) comments dated February 1, 2006 for the *Corrective Measures Implementation Workplan*. For reviewing convenience, U.S. EPA's comment is provided, followed by ENTACT's corresponding response in italicized type.

As requested in your February 1, 2006 letter, ENTACT has also revised the *Corrective Measures Implementation Workplan* to address your comments as indicated in ENTACT's responses. Two copies of the *Corrective Measures Implementation Workplan, Revision 1* are included in this submittal for your approval.

If you have any questions or concerns regarding this submittal, please feel free to contact me at (972) 580-1323, Chad Erdman with Keystone at (309) 697-7165 or Russ Perry on behalf of Keystone at (309) 697-7538.

Respectfully,

Thad Slaughter
ENTACT Services LLC

Enclosure

cc: Chad Erdman, Keystone Steel & Wire Company
Russ Perry, on behalf of Keystone
Jenny Elste, ENTACT Services LLC

ATTACHMENT 1

Comments developed during this review are presented below, following the comment numbering used in the response letter for ease of review.

1. The table provided in this response adequately addresses U.S. EPA's request for specific action levels for each sample type and media.

   ENTACT Response: This table has been added to Section 1.1 of the Field Sampling Plan (FSP).

2. The response to this comment is acceptable.

   ENTACT Response: The text and Figure 1 of the FSP have been modified as stated in our response.

3. In the response to this comment, ENTACT clarifies that F-Pond soil and sediment will not be removed from in-situ treatment area until toxicity characteristic leaching procedure (TCLP) analytical results confirm that the media no longer exhibit the toxicity characteristic for lead and will not be considered hazardous waste when generated. This approach is acceptable and should be specifically stated in the CMI WP.

   ENTACT's Response: ENTACT has modified the text in the CMI Workplan to reflect the approach for treating F-Pond soil and sediment as described in our response to U.S. EPA's comment.

4. The response to this comment is acceptable.

   ENTACT Response: ENTACT has modified Sections 3.2.5 and 3.3.4 of the CMI Workplan as stated in our response.

5. The response to this comment is acceptable.

   ENTACT's Response: Section 3.2.5 of the CMI Workplan has been modified as indicated in our response.

6. The response to this comment is acceptable.

   ENTACT's Response: U.S. EPA's comment is noted.

7. The response to this comment is acceptable, including ENTACT's request for a modification allowing in-situ treatment to render soil at the North Ditch Staging Area nonhazardous prior to excavation (i.e., consistent with the corrective action approach for soil and sediment at the F-Pond).

   ENTACT's Response: Sections 3.3.4 and 3.3.5 have been modified as discussed in our response.

8. ENTACT's explanation for placement of compacted road base material over the North Ditch Staging Area is acceptable and should be added to the text of the CMI WP.

   ENTACT's Response: Section 3.3.6 has been modified as requested in U.S. EPA's comment.

9. U.S. EPA Comment No. 9: Section 3.3.8, Groundwater Monitoring (North Ditch Staging Area). The proposed groundwater monitoring program for the F-Pond and the North Ditch Staging Area to demonstrate no impact to groundwater is unacceptable. U.S. EPA proposes the following groundwater monitoring strategy: a) for the F-Pond, two new additional well must be installed as follows; one well to be installed at the north end of the pond and another new well to be installed at the western portion of the pond to provide adequate coverage. These two new wells should be installed as close as possible to the footprint of the F-Pond. For the North Ditch Staging Area, two new monitoring wells must be installed as follows; one well to be installed at the north and another well must be installed at the southwest corner of the North Ditch Staging Area. These new wells in addition to the 3 existing wells must be sampled quarterly for one year. After one year of successfully demonstrating that the groundwater in these areas has not been impacted, the wells can be abandoned appropriately. The revised CMI workplan must be revised to include all of the above recommendations.

   ENTACT's Response: Sections 3.2.9 and 3.3.8 have been modified to address U.S. EPA's comment from the January 4, 2006 letter. Refer to Figure 2 for the proposed locations for the groundwater monitoring wells.

10. The response to this comment is acceptable.

    ENTACT's Response: Section 4.1.2 and applicable sections of the QAPP have been modified to address U.S. EPA's comment concerning quarterly progress reports.

11. The response to this comment is acceptable.

    ENTACT's Response: The work schedule presented in the Section 2.2 of Appendix A-SWPPP has been modified as discussed in our response.

12. The response to this comment is acceptable.

    ENTACT's Response: The SWPPP-Appendix A has been modified as discussed in our response.

13. The response to this comment is acceptable, although the particular approach to be implemented for storm water control has not been specified. It is recommended that the CMI WP and Stormwater Pollution Prevention Plan be clarified to note that earthen berms and hay bales may be used both upgradient and/or downgradient of excavation/work areas, depending on site conditions and project needs.

    ENTACT Response: The Section 3.2 of Appendix A-SWPPP has been modified based on U.S. EPA's comment.

14. Although from a practical standpoint ENTACT's approach to sediment management appears to make sense, the response to this comment is not acceptable. Under the scope of work currently proposed, soil at both sites will now be treated in-situ to avoid generation of a hazardous waste when the soil is disturbed. If the sediment accumulations along the silt fences are found to exhibit the toxicity characteristic for lead, movement of these materials could also be considered generation of a hazardous waste. If it is feasible to treat the accumulated sediments in place to render them nonhazardous when generated, ENTACT should consider sampling the sediments in place for characterization purposes prior to disturbing them. Care should be taken to ensure that the collected samples are adequately representative of the entire volume of accumulated sediments. Alternatively, ENTACT could temporarily containerize sediment accumulations

along the silt fencing, pending TCLP analysis. Sediments found not to exhibit the toxicity characteristic for lead could be returned to the excavated areas after post-excavation confirmation sampling indicates that remediation goals have been achieved. Sediments found to exhibit the toxicity characteristic for lead would require appropriate off-site disposal as hazardous waste.

ENTACT's Response: To clarify ENTACT's previous response, we offer the following: The silt fence is located within the AOC of each unit. Soils collected behind the silt fence, prior to the completion of excavation to achieve the remediation goals, will be moved to an area undergoing in-situ treatment within the AOC, thus eliminating the "new" point of generation issue. Upon completion of the excavation, the silt fences will be removed and the area will be graded.

15. The response to this comment is acceptable.

    ENTACT's Response: Figures 1 and 2 of Appendix A-SWPPP have been modified as stated in our response.

16. The response to this comment is acceptable.

    ENTACT's Response: Section 4 of Appendix A-SWPPP has been modified as stated in our response.

17. The response to this comment is acceptable.

    ENTACT's Response: Appendix A-SWPPP has been modified as stated in our response.

18. The response to this comment is acceptable.

    ENTACT's Response: U.S. EPA's comment is noted.

19. The response to this comment is acceptable.

    ENTACT's Response: U.S. EPA's comment is noted.

20. The response to this comment is acceptable.

    ENTACT's Response: Appendix B-FSP has been modified to reflect our response.

21. The response to this comment is acceptable.

    ENTACT's Response: Section 4.1 of Appendix B-FSP has been modified based on our response.

22. The response to this comment is acceptable.

    ENTACT's Response: Appendix B-FSP has been revised based on our response.

23. The response to this comment is acceptable.

    ENTACT's Response: U.S. EPA's comment is noted.

24. U.S. EPA Comment No. 24: QAPP (Appendix C) Section A.6.1.6, Groundwater. Refer to Comment 9 above with regard to collection of groundwater monitoring well installation and

sampling at the F-Pond and the North Ditch Staging Area. Modify this section of the QAPP accordingly.

ENTACT's Response: Section A.6.1.5 of Appendix C-QAPP has been modified pursuant to U.S. EPA's comment from the January 4, 2006 letter.

25. The response to this comment is acceptable.

ENTACT's Response: Section A.9.4.1 of Appendix C-QAPP has been modified based on our response.

26. The response to this comment is acceptable.

ENTACT's Response: Section B.5.1.2 of Appendix C-QAPP has been modified based on our response.

27. The response to this comment needs to be further clarified. ENTACT indicates that they will "review all of the data to ensure adequacy for use in verifying attainment of remediation goals. This statement suggests that all of the data obtained during the CMI field effort will be validated. ENTACT should confirm that this interpretation is accurate and should specifically reference guidance to be used in the data validation effort (i.e., the National Functional guideline for Organic/Inorganic Data Review).

ENTACT's Response: For clarification purposes, ENTACT reviews all of the data reports received from the laboratory using a Sample Data Evaluation Checklist developed by ENTACT. This checklist is completed by the Regulatory/Technical Officer for approximately 30% of the data reports. The remaining 70% of the data reports are reviewed using the checklist as a guide. Any issues identified during the data review, e.g., percent recoveries outside of control limits, method blank detections, incorrect detection limits, etc., are discussed with the laboratory's Project Manager and the appropriate actions are taken, e.g., sample analyses are re-run, QC data is re-verified by the laboratory, data report is revised and re-issued, etc. A sample copy of the Sample Data Evaluation Checklist is provided for your review.

28. The response to this comment is acceptable.

ENTACT's Response: Tables 1 and 2 of Appendix C-QAPP have been modified based on our response.

29. The response to this comment is partially acceptable. Issues pertaining to Practical quantification limits have been adequately addressed. However, no Discussion is provided in the response with regard to accuracy criteria for each of the volatile and semivolatile organic compounds constituents of concern. The Subject table must still be modified to provide the requested information.

ENTACT's Response: Accuracy criteria for each of the volatile organic compounds and semi-volatile organic compounds measured was not specifically provided in Table 2 of the QAPP due to the fact that these criteria change periodically. The laboratory compiles data and statistically computes the accuracy requirements, i.e. acceptable percent recoveries, for the laboratory control samples and matrix spike/matrix spike duplicates for each organic constituent measured, while still following the requirements of the SW-846 methods. Because the accuracy criteria are updated periodically by the laboratory, the phrase "varies by analyte" was included under the

accuracy column for volatile organic compounds and semi-volatile organic compounds on Table 2 of the QAPP.

KEYSTONE STEEL & WIRE COMPANY
SOIL SAMPLE DATA EVALUATION CHECKLIST
PROJECT NUMBER D1154

Lab File Numbers: _____

Sample Location/Type: _____

Analytical Methods: _____

YES NO

10. Field Duplicate Precision
Field duplicates are used to assess the precision of the sample collection, preparation, and analysis for a particular sample matrix.
No control limit was specified in the Workplan, but a general guideline of 40% will be used.

Were all field duplicate RPDs within control limits? _____ _____
Field duplicates are not collected for TCLP samples and are collected every 10 samples for total samples.

11. Was the project completeness goal met? _____ _____

Comments:

Signed: _____

Date: _____

Field Precision Assessment
RPD=D1-D2/(D1+D2)/2 X 100

Sample No.	COC	Primary Sample Result	Duplicate Sample Result	RPD (%)	> or < 40%	Sample ID No.
1	Lead			#DIV/0!	#DIV/0!	

KEYSTONE STEEL & WIRE COMPANY
SOIL SAMPLE DATA EVALUATION CHECKLIST
PROJECT NUMBER D1154

Lab File Numbers: _____

Sample Location/Type: _____

Analytical Methods: _____

	YES	NO
1. Chain of Custody (COC) Records:		
Are the COCs present with lab report?	_____	_____
Are the COCs complete and signed off?	_____	_____
Were all samples on the COCs analyzed?	_____	_____
2. Was a project narrative available from the laboratory?	_____	_____
Were any problems noted in the lab narrative?	_____	_____
3. Were all holding times met?	_____	_____
4. Was the frequency stated in the Workplan for field duplicates, equipment rinsate, and trip blanks met?	_____	_____
5. Were the field blank and method blank results non-detectable (ND)?	_____	_____
6. Were all matrixes, units, and detection limits reported correctly?	_____	_____
Detection limits were reported per IEPA ADL/PQL.		
7. Were detection limits below action limits?	_____	_____
See above		
8. Accuracy		
Accuracy of the analysis results were evaluated using the percent recovery results for the matrix spike (MS) samples and laboratory control sample (LCS) samples.		
Note: MS/MSD and LCS Limits for Totals *TCLP*		
Pb: 80-120% LCS, 75-125% MS/MSD *Pb: 80-120% LCS, 75-125% MS/MSD*		
Were all MS/MSD spike recoveries within control limits?	_____	_____
Were all LCS spike recoveries within control limits?	_____	_____
9. Precision		
Precision of the analysis results were evaluated using the relative percent difference (RPD) for the MS/MSD pairs.		
Note: RPD 0-20% inorg, 0-40% org		
Were all duplicate RPDs within control limits?	_____	_____

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGIONS 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

February 16, 2006

REPLY TO THE ATTENTION OF:
DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Russ R. Perry
Manager, Energy & Environmental Engineering
Keystone Steel & Wire Company
7000 S.W. Adams Street
Peoria, Illinois 61641-0002

Re: Financial Assurance demonstration
Keystone Steel & Wire Company
EPA ID No. ILD 000 714 881

Dear Mr. Perry:

As was indicated in our January 4, 2006 letter, Keystone Steel & Wire (KS&W) was required to demonstrate that adequate funds will be available for the completion of the selected remedy for the F-Pond and North Ditch Staging Area at the KS&W facility. This financial assurance demonstration was due on January 19, 2006. The U.S. EPA granted KS&W's request that this due date be extended to February 17, 2006. However, based on our February 14, 2006 conference call, KS&W claims that 50% of the approved remediation work at the F-Pond and North Ditch Staging Area has been completed and the implementation of the remaining portion of the remedy at these two units will be completed in 45 days. Therefore, the financial assurance demonstration would not be necessary. Based on this information, the U.S. EPA has agreed to grant KS&W another 45 days extension in lieu of submitting the financial assurance demonstration contingent upon KS&W satisfying the following:

1) Submit to the U.S. EPA all documentation relating to all approved remediation work performed at the F-Pond and the North Ditch Staging Area as of February 14, 2006. This information must include all invoices paid to ENTACT, description of each item of the CMI workplan completed, drawing and any photographs of the completed work and date(s) work was performed. This document must be signed by a responsible corporate officer as defined in 40 CFR 270.11.

2) By April 21, 2006, KS&W must prepay a total of $500,000 to ENTACT. KS&W indicated that ENTACT has agreed to complete the entire remedy approved for the F-Pond and North Ditch Staging Area for the sum total of $500,000. KS&W must submit to U.S. EPA all documents relating to all approved remediation work performed at the F-Pond and the North Ditch Staging Area after February 14, 2006. This information must include invoices paid to ENTACT for all work performed After February 14, 2006, description of all remaining items of the CMI workplan completed, including drawings and photographs of completed work after February 14, 2006. This document must be signed by a responsible corporate officer as defined in 40 CFR 270.11.

Item No. 1 above must be submitted to U.S. EPA within 7 days of receipt of this letter. U.S. EPA will review the document and notify KS&W of its findings. KS&W must also notify U.S. EPA within 7 days of complying with item No. 2 above.

If you have any questions regarding this matter, please contact Jonathan Adenuga at (312) 886-7954.

Sincerely,

Jonathan Adenuga
Waste Pesticides and Toxics Division

Cc: Jim Moore, IEPA
Cc: Connie Crossley, Booze-Allen

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

February 1, 2006

REPLY TO THE ATTENTION OF DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Russ R. Perry
Manager, Energy & Environmental Engineering
Keystone Steel & Wire Company
7000 S.W. Adams Street
Peoria, Illinois 61641-0002

Re: Response to Keystone Steel & Wire's response
Keystone Steel & Wire Company
EPA ID No. ILD 000 714 881

Dear Mr. Perry:

The United States Environmental Protection Agency (U.S. EPA) has completed the review of your January 13, 2006 response to U.S. EPA's January 24, 2006 comments to your Corrective Measures Implementation (CMI) workplan. As we indicated in the January letter, the enclosed Attachment provides U.S. EPA's response to your CMI workplan. Please revise the CMI workplan to address the remaining issues identified in the Attachment and submit the revised workplan within 30 days of receipt of this letter.

If you have any questions regarding this matter, please contact Jonathan Adenuga at (312) 886-7954.

Sincerely,

Jonathan Adenuga
Waste Pesticides and Toxics Division

Cc: Jim Moore, IEPA
Cc: Connie Crossley, Booze

ATTACHMENT

Comments developed during this review are presented below, following the comment numbering used in the response letter for ease of review.

1. The table provided in this response adequately addresses U.S. EPA's request for specific action levels for each sample type and media.

2. The response to this comment is acceptable.

3. In the response to this comment, ENTACT clarifies that F-Pond soils and sediment will not be removed from the in-situ treatment area until toxicity characteristic leaching procedure (TCLP) analytical results confirm that the media no longer exhibit the toxicity characteristic for lead and will not be considered hazardous waste when generated. This approach is acceptable and should be specifically stated in the CMI WP.

4. The response to this comment is acceptable.

5. The response to this comment is acceptable.

6. The response to this comment is acceptable.

7. The response to this comment is acceptable, including ENTACT's request for a modification allowing in-situ treatment to render soil at the North Ditch Staging Area nonhazardous prior to excavation (i.e., consistent with the corrective action approach for soil and sediment at the F-Pond).

8. ENTACT's explanation for placement of compacted road base material over the North Ditch Staging Area is acceptable and should be added to the text of the CMI WP.

9. The response to this comment is acceptable.

10. The response to this comment is acceptable.

11. The response to this comment is acceptable.

12. The response to this comment is acceptable, although the particular approach to be implemented for stormwater control has not been specified. It is recommended that the CMI WP and Stormwater Pollution Prevention Plan be clarified to note that earthen berms and hay bales may be used both upgradient and/or downgradient of excavation/work areas, depending on site conditions and project needs.

13. Although from a practical standpoint ENTACT's approach to sediment management appears to make sense, the response to this comment is not acceptable. Under the scope of work currently proposed, soil at both sites will now be treated in-situ to avoid generation of a hazardous waste when the soil is disturbed. If the sediment accumulations along the silt fences are found to exhibit the toxicity characteristic for lead, movement of these materials could also be considered generation of a hazardous waste. If it is feasible to treat the accumulated sediments in place to render them nonhazardous when generated, ENTACT should consider sampling the sediments in place for characterization purposes prior to disturbing them. Care should be taken to ensure that the collected samples are adequately representative of the entire volume of accumulated sediments. Alternatively, ENTACT could temporarily containerize

sediment accumulations along the silt fencing, pending TCLP analysis. Sediments found not to exhibit the toxicity characteristic for lead could be returned to the excavated areas after post-excavation confirmation sampling indicates that remediation goals have been achieved. Sediments found to exhibit the toxicity characteristic for lead would require appropriate off-site disposal as hazardous waste.

14. The response to this comment is acceptable.

15. The response to this comment is acceptable.

16. The response to this comment is acceptable.

17. The response to this comment is acceptable.

18. The response to this comment is acceptable.

19. The response to this comment is acceptable.

20. The response to this comment is acceptable.

21. The response to this comment is acceptable.

22. The response to this comment is acceptable.

23. The response to this comment is acceptable.

24. The response to this comment is acceptable.

25. The response to this comment needs to be further clarified. ENTACT indicates that they will "review" all of the data to ensure adequacy for use in verifying attainment of remediation goals. This statement suggests that all of the data obtained during the CMI field effort will be validated. ENTACT should confirm that this interpretation is accurate and should specifically reference guidance to be used in the data validation effort (i.e., the National Functional Guidelines for Organic/Inorganic Data Review).

26. The response to this comment is acceptable.

27. The response to this comment is partially acceptable. Issues pertaining to practical quantification limits have been adequately addressed. However, no discussion is provided in the response with regard to accuracy criteria for each of the volatile and semivolatile organic compounds constituents of concern. The subject table must still be modified to provide the requested information.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

January 24, 2006

REPLY TO THE ATTENTION OF DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Russ R. Perry
Manager, Energy & Environmental Engineering
Keystone Steel & Wire Company
7000 S.W. Adams Street
Peoria, Illinois 61641-0002

Re: Response to Keystone Steel & Wire's response
Keystone Steel & Wire Company
EPA ID No. ILD 000 714 881

Dear Mr. Perry:

The United States Environmental Protection Agency (U.S. EPA) has completed the review of your January 13, 2006 letter and response to U.S. EPA's January 2006 comments to your Corrective Measures Implementation (CMI) workplan. There are two separate issues identified in your letter. The first issue deals with groundwater monitoring at the F-pond and the North Ditch Staging Area and the financial assurance requirement. The second issue deals with the main body of the CMI workplan. By this letter, the U.S. EPA is transmitting its response only to the first issue in your letter. Response to your second issue will be addressed separately.

As stated in comment No. 9 of your response, "based on the selected remedy", you believe that an area that will be clean closed to industrial standards should not require groundwater monitoring. Therefore, you are requesting additional clarification on the purpose and objective of the groundwater monitoring requested by U.S. EPA. In response to your request, we offer the following:

Your use of the phrase "clean closed" to industrial standards is somewhat misleading. When you use the phrase clean closed, you are implying that you have returned the site to its original pristine state. This will not be the case with the particular remedy approved for Keystone Steel & Wire (KS&W) facility. The U.S. EPA approved a remedy that allows KS&W to conduct a an in-situ treatment of waste and impacted soils at the F-Pond and the North Ditch such that, they no longer exhibit the toxicity characteristic for lead. Because the treated materials no longer exhibit the toxicity characteristic for lead, does not mean, that lead is no longer present in the treated material. In addition to the in-situ treatment, KS&W is also required to excavate all impacted soil/sediment that exceed the remediation goal of 800mg/kg total lead. Regardless of the fact that the lead concentrations in the sediment/soils left in place are below the 800mg/kg standard, the potential for lead in the treated material to migrate to the underlying groundwater still exist.

Furthermore, the in-situ treatment remedy at the KS&W facility does not preclude the use of other investigative tools that could and should be used at the F-Pond and the North Ditch Staging Area (i.e. performance monitoring). A necessary

component of any ongoing corrective action at a facility is the establishment and implementation of a groundwater monitoring program to demonstrate the effectiveness of the implemented remedy. The groundwater pathway at the KS&W facility is an integral part of the environment that must be investigated. Demonstrating the efficacy of the in-situ treatment, is not only done through post treatment sampling, it also includes the demonstration that the groundwater beneath these units has not been impacted. More importantly, there are no reliable current groundwater data specific to the F-Pond and the North Ditch areas that could be used to qualify the nature of the underlying groundwater. Therefore, Groundwater monitoring ensures the long-term objective of the Corrective Action Program.

Finally, the approved remedy for the KS&W facility does not include any contingencies for an Operation and Maintenance (O&M) program. An O&M program provides an opportunity for ensuring that the implemented remedy is working as intended. In the absence of an O&M program, groundwater monitoring becomes the only available tool for use in ensuring the long term objective of the final remedy. The U.S. EPA continues to insist that KS&W comply with the groundwater monitoring program proposed in the January 2006, letter.

In response to your request for clarification regarding the financial assurance requirement for the corrective measures at the F-Pond and the North Ditch Staging Area, we refer you to the September 30, 2003 memorandum cited in following U.S. EPA website:
http://www.epa.gov/compliance/resources/policies/cleanup/rcra/interim-fin-assur-cor-act.pdf

We hope this clarifies U.S. EPA's position regarding the purpose and objective of the groundwater monitoring for the F-Pond and the North Ditch Staging Area and the financial assurance requirement.

If you have any questions regarding this matter, please contact Jonathan Adenuga at (312) 886-7954.

Sincerely,

Jonathan Adenuga
Waste Pesticides and Toxics Division

Cc: Jim Moore, IEPA
Cc: Connie Crossley, Booze-Allen

ENTACT
environmental services

3129 Bass Pro Drive
Grapevine, Texas
76051

January 13, 2006

Mr. Jonathan Adenuga
U.S. EPA Region 5, DE-9J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3507

RE: Keystone Steel & Wire Company
7000 SW Adams Street, Peoria, Illinois

Dear Mr. Adenuga: Jon

On behalf of the Keystone Steel & Wire Company, ENTACT Services LLC (ENTACT) is transmitting the responses to the U.S. Environmental Protection Agency's (U.S. EPA) comments dated January 4, 2006 for the *Corrective Measures Implementation Workplan*. For reviewing convenience, U.S. EPA's comment is provided, followed by ENTACT's corresponding response in italicized type. Pending U.S. EPA's acceptance of ENTACT's responses, the cited sections of the *CMI Workplan* will be revised, as indicated in the responses, and a copy of the revised CMI Workplan will be submitted to U.S. EPA.

Regarding U.S. EPA's Comment No. 9, we would like to request further clarification of the groundwater monitoring requirements for the F-Pond and the North Ditch Staging Area. We are unclear as to the purpose and objective of the groundwater monitoring given the fact that the F-Pond and North Ditch Staging Area will be clean closed to an industrial standard. Additional clarification of U.S. EPA's position with respect to groundwater monitoring would be appreciated and the objectives of this groundwater monitoring program to assist us in designing an appropriate groundwater monitoring program.

On a separate, but related issue, we would also clarification of the financial assurance requirements for the corrective measures as presented in the October 19, 2005 Final Decision and Response to Comments and Statement of Basis. It is our understanding, based on conversations with you, that this requirement is now U.S. EPA policy. We would like to request a copy of this policy and an extension to the January 19, 2005 submittal deadline. An extension to February 17, 2005 to submit proof of this financial assurance would be appreciated.

If after your review of this letter, you would like additional clarification from us, please feel free to contact me at (972) 580-1323, Chad Erdman with Keystone at (309) 697-7165 or Russ Perry on behalf of Keystone at (309) 697-7538.

Respectfully,

Thad Slaughter
ENTACT Services LLC

Enclosure

cc: Chad Erdman, Keystone Steel & Wire Company
Russ Perry, on behalf of Keystone
Jenny Elste, ENTACT Services LLC

ENTACT's Response to U.S. EPA's Comments Dated January 4, 2006 Regarding the Corrective Measures Implementation Workplan for the Keystone Steel & Wire Company's Peoria Facility

U.S. EPA Comment No. 1: Action levels should be specified in the CMI WP for each of the sample types to be collected. Comparison criteria for surface water and groundwater data should be identified.

ENTACT Response: The following table will be included in Section 1 of the Field Sampling Plan.

GOALS				
Sample Type	**Constituents of Concern**	**F-Pond**	**North Ditch Staging Area**	**Backfill/ Topsoil**
XRF Field Screening	Lead	800 ppm	800 ppm	
	Iron	100,000 ppm		
Surface Water	Lead	Water will be transferred to the facility WWTP for discharge with facility wastewaters. The discharge will meet the limits specified in the facility's NPDES permit.		
	Iron			
	Manganese			
	Trichloroethylene			
Characterization	Lead	800 mg/kg		
	Iron	100,000 mg/kg		
	TCLP Lead	5 mg/l	5 mg/l	
Post-excavation Confirmation	Lead	800 mg/kg	800 mg/kg	
	Iron	100,000 mg/kg		
	TCLP Lead	5 mg/l	5 mg/l	
Post-treatment Verification (for CAMU option)	TCLP Lead		5 mg/l	
Backfill/Topsoil	Arsenic			13 mg/kg
	Barium			14,000 mg/kg
	Cadmium			200 mg/kg
	Chromium			420 mg/kg
	Lead			400 mg/kg
	Mercury			61 mg/kg
	Selenium			1,000 mg/kg
	Silver			1,000 mg/kg
	TPH			100 mg/kg
Groundwater	Lead	0.015 mg/l	0.015 mg/l	

U.S. EPA Comment No. 2: Section 3.2.4, Identification of Characteristically Hazardous Sediment/Soil (F-Pond). According to this section, a four-part composite sample will be collected from each F-Pond grid to identify soil and sediment exhibiting the toxicity characteristic for lead. The four composite sample parts will be collected from the four corners of each grid, specifically within 5 to 10 feet of each corner. Based on

the 50 by 50 foot grid spacing specified in Section 3.1.9, this proposed sample distribution clusters sampling close together at the corners of neighboring grids, while leaving a relatively large area in the center of the grid unrepresented. Unless additional justification is provided regarding the potential effectiveness of this sampling plan, a five-part composite sampling program (including one sample portion from the grid center) should be implemented. Alternatively, the sampling plan can be revised to more evenly distribute composite sampling locations (e.g., along the grid diagonals approximately 15 to 20 feet from the sample corners). In addition, the composite sampling depth should be specified in this section. Revise all project documentation accordingly. In particular, figures in the FSP should be modified to show the specified grid size, rather than a 25 by 25 foot grid.

ENTACT Response: Grids located in the F-Pond will have a uniform square footage of approximately 2,500 square feet, but may have differing lengths or widths in order to conform to the perimeter of the unit. The depiction of the grids on Figure 1 of the Field Sampling Plan is correct; however, the bar scale is incorrect. The bar scale will be revised to reflect 50 and 100 foot lengths.

The composite samples collected from each grid area will consist of 5 parts with 1 part each collected from within 5 to 10 feet of each grid corner and from the center of the grid. The samples will be collected from a depth of 0 to 6 inches below ground surface. The text will be modified to reflect our response to U.S. EPA's comment

U.S. EPA Comment No. 3: Section 3.2.5, In-Situ Treatment and Stabilization (F-Pond). As outlined in the April 2005 CMP, corrective measures planned for the F-Pond include in-situ treatment of characteristically hazardous soils and sediment to render them non-hazardous, followed by excavation to achieve remediation goals for total lead and iron. Section 3.2.5 of this CMI WP also calls for in-situ treatment of characteristically hazardous soils and sediment at the F-Pond, followed immediately by excavation and stockpiling on site within the footprint of the F-Pond. Rather than sample the treated soil and sediment in place to confirm that the media no longer exhibit the toxicity characteristic for lead, Keystone proposes to collect samples from the various stockpiles for hazardous waste characterization purposes. This proposal is unacceptable. All post-treatment characterization sampling of F-Pond soil and sediment should be conducted while the soil and sediment remains in place. Excavation should not occur until sampling results confirm that the treated soil and sediment will not be considered hazardous when disturbed (even if remaining within the F-Pond footprint).

ENTACT Response: For clarification purposes, ENTACT offers the following discussion: Upon the completion of in-situ treatment, the material will be re-sampled in place, in volumes of approximately 300 cubic yards, within the treatment area for characterization purposes. The material will not be removed from the treatment area until analytical results are received which indicate successful treatment. At that point, the material will be staged for off-site disposal.

The sampling conducted after the completion of in-situ treatment is considered in-situ post-treatment characterization sampling and not post-treatment verification sampling. Post-treatment verification sampling will only be conducted where the impacted material is removed from the excavation, placed in a treatment CAMU, treated, and sampled to determine if the soil no longer contains a waste that exhibits the toxicity characteristic for lead, and determine if the applicable LDRs have been achieved before the material is sent off-site for disposal in a permitted Subtitle D landfill.

U.S. EPA Comment No. 4: Section 6.1.1 of the April 2005 CMP indicates that a treatability study will be performed to determine the appropriate additive and dosage for rendering F-Pond soils and sediments non-hazardous when generated. Section 3.2.5 of the CMI WP indicates that the contractor will rely on previous experience with the treatment of soil and sediment at sites with similar characteristics in lieu of a formal treatability study. This proposal is acceptable, as long as Keystone ensures that treatment objectives for the

F-Pond are ultimately met. In addition, additional detail should be provided in this section of the CMI WP to document the expected dosage of triple superphosphate (TSP) for soil/sediment at the F-Pond, or specific field methods the contractor will use to determine that sufficient TSP has been added to render the soils non-hazardous and ready for TCLP sampling. The TSP dosage ratio should also be provided in Section 3.3.5 for treatment at the North Ditch Staging Area.

ENTACT Response: Within each grid, the areal extent and depth of the lead-impacted soils is known. Based on this information, an approximate weight of the lead-impacted soils to be treated is known, and based on that weight calculation, TSP will be added at a dosage rate of 2-5% by weight of the material to be treated. ENTACT will determine the success of the in-situ treatment process through the collection of post-treatment characterization samples at a frequency of 1 sample per 300 cubic yards. In-situ treatment will be considered successful when the results of the characterization sampling analysis are less than 5 mg/l TCLP lead. ENTACT will modify the CMI Workplan to reflect our response to your comment.

U.S. EPA Comment No. 5: The second paragraph of this section indicates that wet impacted soil and sediment with total lead and/or iron concentrations above applicable remediation goals will be solidified to remove free liquids prior to transportation for off-site disposal. Unless the soil will be solidified prior to excavation, the CMI WP should be expanded to clarify how free liquids in the stockpiled soil/sediment will be controlled such that additional areas within the F-Pond footprint are not negatively impacted.

ENTACT Response: ENTACT will modify the CMI Workplan to state that wet, impacted soil and sediment will be stabilized in place prior to excavation.

U.S. EPA Comment No. 6: Section 3.2.8, Restoration (F-Pond). This section of the document seems to indicate that the only Nationwide Permit 38 restoration requirement applicable to the F-Pond corrective measures proposal involves grading for drainage. Keystone should confirm that this interpretation is correct and specifically clarify that such grading is the only mandatory restoration activity.

ENTACT Response: The restoration activities were clearly stated in the Nationwide 38 Permit Application and specifically discussed with the U.S. ACOE upon its receipt of the application. The Nationwide 38 Permit Application was approved by the U.S. ACOE for the stated remedial activities associated with the F-Pond Area. Due to the quality and size of the wetlands delineated in the F-Pond Area, and to the nature and location of the F-Pond, i.e. within an active industrial site and adjacent to 2 industrial sludge lagoons and a stormwater outfall, additional restoration measures were not required by the U.S. ACOE.

U.S. EPA Comment No. 7: Section 3.3.5, Treatment (North Ditch Staging Area). According to this section, one post-treatment verification grab sample will be collected from each treated soil stockpile at the North Ditch Staging Area (i.e., one sample for TCLP analysis for each 300 cubic yards of treated soil). Keystone should verify that the receiving Subtitle D landfill facility will accept this sampling ratio for hazardous waste characterization or will require more frequent characterization sampling and analysis. In addition, Keystone should provide justification for collecting only a single grab sample from each stockpile rather than compositing several samples from each stockpile. It would seem that composite sampling would provide a representative characterization of the entire soil pile.

ENTACT Response: The receiving landfill has approved of the 300 cubic yard sampling frequency requirement specified in the CMI Workplan. We agree that composite sampling of the staged material may sometimes be more representative of all of the material in the stockpile, but a grab sampling strategy is required for determination of LDR compliance pursuant to 40 CFR §268.48(a) and §268.49(c).

To be consistent with what is being implemented at the F-pond area, i.e., in-situ treatment, ENTACT is requesting a modification to the CMI Workplan to allow in-situ treatment of the impacted soils at the North

Ditch Staging Area, in lieu of using a CAMU. With this modification, the need to sample for LDR compliance becomes a moot issue because ENTACT will not generate a hazardous waste or soils containing a hazardous waste. ENTACT will modify the CMI Workplan to reflect this, if approved by U.S. EPA.

U.S. EPA Comment No. 8: Section 3.3.6, Restoration (North Ditch Staging Area). Explain why the North Ditch Staging Area will be covered with compacted road base material rather than being revegetated, this section of the CMI WP should specify Keystone's plans for future use of this area as a parking lot (as indicated in Section 3.3 of the Stormwater Pollution Prevention Plan).

ENTACT Response: Currently, the North Ditch Staging Area is being used for a parking lot and storage area. Upon completion of the remediation activities for this area, the area will be restored to its current condition and use, i.e., a parking lot and/or equipment storage area.

U.S. EPA Comment No. 9: Section 3.3.8, Groundwater Monitoring (North Ditch Staging Area). The proposed groundwater monitoring program for the F-Pond and the North Ditch Staging Area to demonstrate no impact to groundwater is unacceptable. U.S. EPA proposes the following groundwater monitoring strategy: a) for the F-Pond, two new additional well must be installed as follows; one well to be installed at the north end of the pond and another new well to be installed at the western portion of the pond to provide adequate coverage. These two new wells should be installed as close as possible to the footprint of the F-Pond. For the North Ditch Staging Area, two new monitoring wells must be installed as follows; one well to be installed at the north and another well must be installed at the southwest corner of the North Ditch Staging Area. These new wells in addition to the 3 existing wells must be sampled quarterly for one year. After one year of successfully demonstrating that the groundwater in these areas has not been impacted, the wells can be abandoned appropriately. The revised CMI workplan must be revised to include all of the above recommendations.

ENTACT Response: Based on the selected remedy, the F-Pond and North Ditch Staging Area will be clean closed to an industrial standard, and typically would not require additional groundwater monitoring. Keystone and ENTACT would like additional clarification on the purpose and objective of the groundwater monitoring requested by U.S. EPA so that an appropriate monitoring program can be properly designed for these units.

U.S. EPA Comment No. 10: This section should be expanded to note that quarterly progress reports will also identify problems encountered and resolutions implemented as part of CMI activity over the subject quarter. Also revise appropriate sections of the QAPP to reflect this clarification.

ENTACT Response: The progress reports submitted to U.S. EPA on a quarterly basis will include any problems encountered and resolutions implemented as part of the CMI activities over the subject quarter. ENTACT will modify the CMI Workplan, including the QAPP, to reflect our response to U.S. EPA's comment.

U.S. EPA Comment No. 11: SWPPP Appendix A Section 2.2, Sequence of Major Activities. Although Section 5.0 of the CMI WP indicated that corrective action work would be conducted between December 2005 and March 2006, this section of the SWPPP indicates a schedule running from November 2005 through February 2006. These inconsistencies between project documentation should be resolved. Given the current project status, it may be most appropriate to change both documents to reference a schedule from January to April 2006.

ENTACT Response: The project schedule will be revised to reflect a start date of January 2006 and a completion date of April 2006.

U.S. EPA Comment No. 12: SWPPP Appendix A. This section should be revised to note that Adams Street is on the west side of the facility and the Illinois River is on the southeast side, as shown in Figure 1.

ENTACT Response: Section 2.3 will be revised based on U.S. EPA's comment.

U.S. EPA Comment No. 13: SWPPP Appendix A Section 3.2, Structural Practices. According to this section of the SWPPP, earthen or hay bale berms may be installed on the downgradient edge of excavation/work areas to reduce stormwater velocities and prevent sediment/soil from being transported out of the unit. However, Section 3.1.8 of the CMI WP indicated that these berms would be constructed upgradient of the units to prevent stormwater run-on from entering the work areas. Although both approaches have their strengths and drawbacks, the two project documents should outline the same plan for stormwater control. Revise the document accordingly.

ENTACT Response: The applicable sections of the SWPPP and the CMI Workplan will be revised for consistency between the cited documents.

U.S. EPA Comment No. 14: SWPPP Appendix A. According to this section, sediments accumulating behind the silt fencing at Keystone will be collected and either consolidated with excavated soils for off-site disposal, or returned to on-site source areas if clean. The SWPPP should be expanded to clarify how Keystone will distinguish between impacted and clean sediment accumulations. Because silt fencing is proposed for placement downgradient of work areas, it is possible that all collected sediments may have originated in or passed through contaminated areas.

ENTACT Response: Accumulated sediments/soils collected from behind the silt fencing, prior to achieving acceptable post-excavation confirmation sampling results, will be consolidated with the excavated soils and treated, if necessary, for off-site disposal. Accumulated sediments/soils collected from behind the silt fencing, after post-excavation confirmation sampling results have been determined to be acceptable based on the remediation goals, will be placed back within the excavated area. ENTACT will modify the CMI Workplan to reflect our response to your comment.

U.S. EPA Comment No. 15: SWPPP Appendix A Section 3.5.1, Off-Site Vehicle Tracking. For clarity, the "existing stabilized construction entrance/exit" reference in the second paragraph of this section should be shown on Figure 2 of the CMI WP.

ENTACT Response: For clarity purposes the "existing stabilized construction/exit" will be added to Figures 1 and 2 of the SWPPP, in lieu of Figure 2 of the CMI Workplan.

U.S. EPA Comment No. 16: SWPPP Appendix A Section 4.0, Maintenance and Inspections. The last sentence in this section appears to include an incorrect reference to Section 3.4. Documentation requirements for corrective measures are discussed in Section 5.0. Verify the correct reference and revise the text accordingly.

ENTACT Response: We agree. The section referenced in Section 4.0 will be changed to Section 5.0 in the revised CMI Workplan.

U.S. EPA Comment No. 17: SWPPP Appendix A Section 5.5, Certifications. This section indicates that all project contractors and subcontractors have agreed to maintain the provisions of this SWPPP. Rather than signed certifications, however, Attachment A-3 contains only blank certification forms. The final version of the SWPPP should include actual contractor and subcontractor signatures.

ENTACT Response: The signed version of the SWPPP is maintained at the project site. A reference which states this fact will be added to this section of the revised CMI Workplan.

U.S. EPA Comment No. 18: FSP Appendix B Section 2.2, Sample Identification System and Sample Frequency. The sample identification system should be expanded to also include F-Pond post-treatment verification samples that will be used to ensure that the soil and sediment does not exceed TCLP criteria and will not be considered hazardous when generated.

ENTACT Response: Post-treatment characterization samples will be collected from the in-situ treated material of the F-Pond to determine if the material will exhibit a hazardous toxicity characteristic, when generated. If the material still exhibits a hazardous toxicity characteristic after the initial treatment, if generated, in-situ treatment will continue until the results of post-treatment characterization sampling indicate that the material will not exhibit a hazardous toxicity characteristic, when generated. Post-treatment verification samples will only be collected from ex-situ treated stockpiles to confirm that the material no longer exhibits the toxicity characteristic for lead and is in compliance with the LDR requirements at 40 CFR §268.49(c).

Post-treatment verification sampling activities related to the North Ditch Staging Area will be removed the CMI Workplan if in-situ treatment is allowed vs. treatment in a CAMU (see ENTACT's Response to U.S. EPA Comment No. 7).

U.S. EPA Comment No. 19: FSP Appendix B. According to the fourth step in the x-ray fluorescence (XRF) field screening process, a grab sample of sediment/soil may be collected and dried in a microwave prior to measurement if the soil moisture content is not optimal for screening. This section of the FSP should be expanded to document how Keystone will determine if drying is necessary (e.g., testing to indicate percent moisture and the specific test method to be used). In addition, the FSP should outline the procedure for temporary sample storage prior to and during the drying process, any pertinent chain of custody requirements, the microwave location (preferably on-site), the sample drying time duration or criteria and test methods upon which this determination will be based (e.g., less than 25% moisture), and the schedule for drying, screening, and recording results for these grab samples (e.g., on an individual sample basis or in a batch at the end of the day).

ENTACT Response: Per manufacturer instructions and U.S. EPA Method 6200 (Field Portable X-Ray Fluorescence Spectrometry for the Determination of Elemental Concentrations in Soil and Sediment), a sample should be dried if the sample is saturated with water. In the field, saturation is typically determined by visual observation. Because the XRF screening unit is being used for field screening purposes only and not as a substitute for confirmation sampling and laboratory analysis, specific procedures regarding drying, sample storage and custody control are not warranted. In addition, the person responsible for XRF field screening typically performs all functions related to XRF field screening, including sample collection, transport/storage, drying, screening, and disposal. For the purposes of these corrective measures, XRF field screening will direct the excavation activities and determine if the collection of post-excavation confirmation samples, i.e. laboratory analysis, is warranted.

U.S. EPA Comment No. 20: FSP Appendix B Section 3.5, Post-Treatment Verification Samples. Sampling procedures similar to those outlined in this section should also be used to verify that in-situ treatment at the F-Pond has successfully rendered impacted soil/sediment non-hazardous. A post-treatment verification sampling program should also be outlined to confirm that all free liquids have been stabilized prior to transport.

ENTACT Response: With respect to post-treatment characterization sampling, refer to ENTACT's response to U.S. EPA Comment No. 18. The only area where "free liquids" may be an issue is in the F-Pond Area.

ENTACT proposes to run EPA Method 9095B, the Paint Filter Liquids Test, to determine compliance with 40 CFR §265.314. The test will be run at a frequency of one run per 10,000 cubic yards or a minimum of one run per day. The FSP will be modified to reflect ENTACT's response to U.S. EPA's comment.

U.S. EPA Comment No. 21: FSP Appendix B Section 4.1, Analytical Methods. The preparation method listed in this table for measuring total lead, iron, and manganese concentrations in water should be revised to reflect the most current approved version of the method (i.e., SW3010A rather than SW3010B), as listed in EPA's SW-846 online reference manual at www.epa.gov/epaoswer/hazwaste/test/main.htm.

ENTACT Response: The cited methods will be revised based on U.S. EPA's comment.

U.S. EPA Comment No. 22: FSP Appendix B. In addition to noting any deviations from the approved FSP, the field log books should document why the deviation was necessary and any expected impacts on the results of the CMI or laboratory analyses.

ENTACT Response: Section 6 of the Field Sampling Plan will be revised based on U.S. EPA's comment.

U.S. EPA Comment No. 23: QAPP (Appendix C) Section A.6.1.4, Treated Sediment/Soil Stockpiles. Refer to Comment above with regard to sampling of in-situ treated soil at the F-Pond rather than from soil stockpiles to verify that the media has been rendered non-hazardous prior to excavation. Revised this section of the QAPP as needed. Section B.1.4 of the QAPP should also be similarly revised.

ENTACT Response: Refer to ENTACT's response to U.S. EPA Comment Nos. 7 and 18.

U.S. EPA Comment No. 24: QAPP (Appendix C) Section A.6.1.6, Groundwater. Refer to Comment 9 above with regard to collection of groundwater monitoring well installation and sampling at the F-Pond and the North Ditch Staging Area. Modify this section of the QAPP accordingly.

ENTACT Response: Refer to ENTACT's response to U.S. EPA Comment No. 9.

U.S. EPA Comment No. 25: QAPP (Appendix C) Section A.9.4.1, Weekly and Quarterly Reports. Refer to Comment 10 above.

ENTACT Response: Refer to ENTACT's response to U.S. EPA Comment No. 10.

U.S. EPA Comment No. 26: QAPP (Appendix C) Section B.5.1.2, Field Equipment. Inadequate quality control requirements are specified for the XRF analyses. Expand the documentation to note that calibration checks and target element response checks should be conducted twice daily, prior to and upon completion of analysis of field samples. In addition, target analytes, target concentrations, and acceptability criteria should be specified for each of the above-referenced quality control (QC) checks.

ENTACT Response: The section will be revised as commented by U.S. EPA. In addition, a reference will be included that states that the target analytes, target concentration and acceptability criteria for the readings are provided in the Niton XRF User Manual.

U.S. EPA Comment No. 27: QAPP (Appendix C). The laboratory data validation requirements should be expanded to require that at least 10 percent of the confirmation sample data from each of the sites be validated by a party independent of the laboratory in accordance with the National Functional Guidelines for Organic/Inorganic Data Review to ensure adequacy of the data to verify attainment of remedial action objectives.

ENTACT Response: With respect to data validation requirements, ENTACT reviews all of the data to ensure the adequacy of the data in verifying attainment of the remediation goals. This statement will be added to the cited section.

U.S. EPA Comment No. 28: QAPP (Appendix C). The test methods listed in this table for use during the CMI field effort should be updated to reflect the most current version of SW-846 preparation and analysis methods (e.g., SW3050B, SW3550B, SW3010A, SW8260B). For assistance in identifying current methods, please refer to EPA's SW-846 online reference manual at www.epa.gov/epaoswer/hazwaste/test/main.htm. If an older or alternate method has been specifically selected for this investigation, the text should provide clear justification for that decision.

ENTACT Response: The QAPP and relevant test methods will be updated in Tables 1 and 2 of the QAPP, as appropriate.

U.S. EPA Comment No. 29: QAPP (Appendix C) Table 2, List of Laboratory Data Quality Assurance Objectives. This table should be expanded to specify the required Illinois Environmental Protection Agency (IEPA) practical quantification limits (PQLs) that are referenced as the target reporting limits for the project and ensure that they are less than the cleanup objectives and other comparison criteria that will be used for the project. The table should also specify accuracy criteria for each of the volatile organic compound (VOC) and semivolatile organic compound (SVOC) constituents of concern (COCs) for the project.

ENTACT Response: Per 35 IAC §740.415(d)(3), the PQLs used by the laboratory for the requested soil analyses are less than or equal to the most protective Tier I soil remediation objectives in 35 Ill. Adm. Code 742 Appendix B or the remediation objective concentrations for the site. In most cases, however, the PQL will equal the lowest concentration that reliably can be achieved within the laboratory's specified limits of precision and accuracy during routine laboratory operating conditions, but is not greater than ten times the method detection limit. Because the PQL varies per analytical run, this information was not provided in the CMI Workplan. Instead, the laboratory was requested to comply with IEPA's requirements, as stated above. References will be added to Table 2 of the QAPP which reflect this.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

January 4, 2006

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Russ R. Perry
Manager, Energy & Environmental Engineering
Keystone Steel & Wire Company
7000 S.W. Adams Street
Peoria, Illinois 61641-0002

Re: Corrective Measures Implementation Workplan
Keystone Steel & Wire Company
EPA ID No. ILD 000 714 881

Dear Mr. Perry:

The United States Environmental Protection Agency (U.S. EPA) has completed review of the November 2005 revised Corrective Measures Implementation (CMI) workplan. Although the corrective measures process outlined in the CMI WP generally appears technically sound and consistent with the approaches proposed in the April 2005 revised CMP, several significant issues of concern have been identified. These issues are outlined in the comments below. Comments specific to the Stormwater Pollution Prevention Plann (SWPPP), the Field Sampling Plan (FSP) and QAPP are also provided in the sections below. Additionally, in the October 19, 2005, selection of the final remedial alternative, KS&W was required to demonstrate that adequate funds will be available to complete the construction as well as the operation and maintenance of the selected remedy. KS&W was required to provide this financial assurance within 90 days after U.S. EPA selects the final remedy. This financial assurance demonstration is due on January 19, 2006. KS&W must revise the CMI workplan to address all of the comments in this attachment within 30 days of receipt of this letter and submit to U.S. EPA for review and approval.

If you have any questions regarding this matter, please contact Jonathan Adenuga at (312) 886-7954.

Sincerely,

Jonathan Adenuga
Waste Pesticides and Toxics Division

Enclosure

ATTACHMENT

1) Action levels should be specified in the CMI WP for each of the sample types to be collected. Comparison criteria for surface water and groundwater data should be identified.

Section 3.2.4, Identification of Characteristically Hazardous Sediment/Soil (F-Pond)

2) According to this section, a four-part composite sample will be collected from each F-Pond grid to identify soil and sediment exhibiting the toxicity characteristic for lead. The four composite sample parts will be collected from the four corners of each grid, specifically within 5 to 10 feet of each corner. Based on the 50 by 50 foot grid spacing specified in Section 3.1.9, this proposed sample distribution clusters sampling close together at the corners of neighboring grids, while leaving a relatively large area in the center of the grid unrepresented. Unless additional justification is provided regarding the potential effectiveness of this sampling plan, a five-part composite sampling program (including one sample portion from the grid center) should be implemented. Alternatively, the sampling plan can be revised to more evenly distribute composite sampling locations (e.g., along the grid diagonals approximately 15 to 20 feet from the sample corners). In addition, the composite sampling depth should be specified in this section. Revise all project documentation accordingly. In particular, figures in the FSP should be modified to show the specified grid size, rather than a 25 by 25 foot grid.

Section 3.2.5, In-Situ Treatment and Stabilization (F-Pond)

3) As outlined in the April 2005 CMP, corrective measures planned for the F-Pond include in-situ treatment of characteristically hazardous soils and sediment to render them nonhazardous, followed by excavation to achieve remediation goals for total lead and iron. Section 3.2.5 of this CMI WP also calls for in-situ treatment of characteristically hazardous soils and sediment at the F-Pond, followed immediately by excavation and stockpiling on site within the footprint of the F-Pond. Rather than sample the treated soil and sediment in place to confirm that the media no longer exhibit the toxicity characteristic for lead, Keystone proposes to collect samples from the various stockpiles for hazardous waste characterization purposes. This proposal is unacceptable. All post-treatment characterization sampling of F-Pond soil and sediment should be conducted while the soil and sediment remains in place. Excavation should not occur until sampling results confirm that the treated soil and sediment will not be considered hazardous when disturbed (even if remaining within the F-Pond footprint).

4) Section 6.1.1 of the April 2005 CMP indicates that a treatability study will be performed to determine the appropriate additive and dosage for rendering F-Pond soils and sediments nonhazardous when generated. Section 3.2.5 of the CMI WP indicates that the contractor will rely on previous experience with the treatment of soil and sediment at sites with similar characteristics in lieu of a formal treatability study. This proposal is acceptable, as long as Keystone ensures that treatment objectives for the F-Pond are

ultimately met. In addition, additional detail should be provided in this section of the CMI WP to document the expected dosage of triple superphosphate (TSP) for soil/sediment at the F-Pond, or specific field methods the contractor will use to determine that sufficient TSP has been added to render the soils nonhazardous and ready for TCLP sampling. The TSP dosage ratio should also be provided in Section 3.3.5 for treatment at the North Ditch Staging Area.

5) The second paragraph of this section indicates that wet impacted soil and sediment with total lead and/or iron concentrations above applicable remediation goals will be solidified to remove free liquids prior to transportation for off-site disposal. Unless the soil will be solidified prior to excavation, the CMI WP should be expanded to clarify how free liquids in the stockpiled soil/sediment will be controlled such that additional areas within the F-Pond footprint are not negatively impacted.

Section 3.2.8, Restoration (F-Pond)

6) This section of the document seems to indicate that the only Nationwide Permit 38 restoration requirement applicable to the F-Pond corrective measures proposal involves grading for drainage. Keystone should confirm that this interpretation is correct and specifically clarify that such grading is the only mandatory restoration activity.

Section 3.3.5, Treatment (North Ditch Staging Area)

7) According to this section, one post-treatment verification grab sample will be collected from each treated soil stockpile at the North Ditch Staging Area (i.e., one sample for TCLP analysis for each 300 cubic yards of treated soil). Keystone should verify that the receiving Subtitle D landfill facility will accept this sampling ratio for hazardous waste characterization or will require more frequent characterization sampling and analysis. In addition, Keystone should provide justification for collecting only a single grab sample from each stockpile rather than compositing several samples from each stockpile. It would seem that composite sampling would provide a representative characterization of the entire soil pile.

Section 3.3.6, Restoration (North Ditch Staging Area)

8) Explain why the North Ditch Staging Area will be covered with compacted road base material rather than being revegetated, this section of the CMI WP should specify Keystone's plans for future use of this area as a parking lot (as indicated in Section 3.3 of the Stormwater Pollution Prevention Plan).

Section 3.3.8, Groundwater Monitoring (North Ditch Staging Area)

9) The proposed groundwater monitoring program for the F-Pond and the North Ditch Staging area to demonstrate no impact to groundwater is unacceptable. U.S. EPA proposes the following groundwater monitoring strategy: a) for the F-Pond, two new additional well must be installed as follows; one well to

be installed at the north end of the pond and another new well to be installed at the western portion of the pond to provide adequate coverage. These two new wells should be installed as close as possible to the footprint of the F-Pond. For the North Ditch Staging Area, two new monitoring wells must be installed as follows; one well to be installed at the north and another well must be installed at the southwest corner of the North Ditch Staging Area. These new wells in addition to the 3 existing wells must be sampled quarterly for one year. After one year of successfully demonstrating that the groundwater in these areas has not been impacted, the wells can be abandoned appropriately. The revised CMI workplan must be revised to include all of the above recommendations.

10) This section should be expanded to note that quarterly progress reports will also identify problems encountered and resolutions implemented as part of CMI activity over the subject quarter. Also revise appropriate sections of the QAPP to reflect this clarification.

SPECIFIC COMMENTS ON THE SWPPP (Appendix A)

Section 2.2, Sequence of Major Activities

11) Although Section 5.0 of the CMI WP indicated that corrective action work would be conducted between December 2005 and March 2006, this section of the SWPPP indicates a schedule running from November 2005 through February 2006. These inconsistencies between project documentation should be resolved. Given the current project status, it may be most appropriate to change both documents to reference a schedule from January to April 2006.

12) This section should be revised to note that Adams Street is on the west side of the facility and the Illinois River is on the southeast side, as shown in Figure 1.

Section 3.2, Structural Practices

13) According to this section of the SWPPP, earthen or hay bale berms may be installed on the downgradient edge of excavation/work areas to reduce stormwater velocities and prevent sediment/soil from being transported out of the unit. However, Section 3.1.8 of the CMI WP indicated that these berms would be constructed upgradient of the units to prevent stormwater run-on from entering the work areas. Although both approaches have their strengths and drawbacks, the two project documents should outline the same plan for stormwater control. Revise the document accordingly.

14) According to this section, sediments accumulating behind the silt fencing at Keystone will be collected and either consolidated with excavated soils for off-site disposal, or returned to on-site source areas if clean. The SWPPP should be expanded to clarify how Keystone will distinguish between impacted and clean sediment accumulations. Because silt fencing is proposed for placement downgradient of work areas, it is possible that all collected sediments may have originated in or passed through contaminated areas.

Section 3.5.1, Off-Site Vehicle Tracking

15) For clarity, the ôexisting stabilized construction entrance/exitö reference in the second paragraph of this section should be shown on Figure 2 of the CMI WP.

Section 4.0, Maintenance and Inspections

16) The last sentence in this section appears to include an incorrect reference to Section 3.4. Documentation requirements for corrective measures are discussed in Section 5.0. Verify the correct reference and revise the text accordingly.

Section 5.5, Certifications

17) This section indicates that all project contractors and subcontractors have agreed to maintain the provisions of this SWPPP. Rather than signed certifications, however, Attachment A-3 contains only blank certification forms. The final version of the SWPPP should include actual contractor and subcontractor signatures.

SPECIFIC COMMENTS ON THE FSP (Appendix B)

Section 2.2, Sample Identification System and Sample Frequency

18) The sample identification system should be expanded to also include F-Pond posttreatment verification samples that will be used to ensure that the soil and sediment does not exceed TCLP criteria and will not be considered hazardous when generated.

19) According to the fourth step in the x-ray fluorescence (XRF) field screening process, a grab sample of sediment/soil may be collected and dried in a microwave prior to measurement if the soil moisture content is not optimal for screening. This section of the FSP should be expanded to document how Keystone will determine if drying is necessary (e.g., testing to indicate percent moisture and the specific test method to be used). In addition, the FSP should outline the procedure for temporary sample storage prior to and during the drying process, any pertinent chain of custody requirements, the microwave location (preferably on-site), the sample drying time duration or criteria and test methods upon which this determination will be based (e.g., less than 25% moisture), and the schedule for drying, screening, and recording results for these grab samples (e.g., on an individual sample basis or in a batch at the end of the day).

Section 3.5, Post-Treatment Verification Samples

20) Sampling procedures similar to those outlined in this section should also be used to verify that in-situ treatment at the F-Pond has successfully rendered impacted soil/sediment nonhazardous. A post-treatment verification sampling program should also be outlined to confirm that all free liquids have been stabilized prior to transport.

Section 4.1, Analytical Methods

21) The preparation method listed in this table for measuring total lead, iron, and manganese concentrations in water should be revised to reflect the most current approved version of the method (i.e., SW3010A rather than SW3010B), as listed in EPAÆs SW-846 online reference manual at www.epa.gov/epaoswer/hazwaste/test/main.htm.

22) In addition to noting any deviations from the approved FSP, the field log books should document why the deviation was necessary and any expected impacts on the results of the CMI or laboratory analyses.

SPECIFIC COMMENTS ON THE QAPP (Appendix C)

Section A.6.1.4, Treated Sediment/Soil Stockpiles

23) Refer to Comment above with regard to sampling of in-situ treated soil at the F-Pond rather than from soil stockpiles to verify that the media has been rendered nonhazardous prior to excavation. Revised this section of the QAPP as needed. Section B.1.4 of the QAPP should also be similarly revised.

Section A.6.1.6, Groundwater

24) Refer to Comment 9 above with regard to collection of groundwater monitoring well installation and sampling at the F-Pond and the North Ditch Staging Area. Modify this section of the QAPP accordingly.

Section A.9.4.1, Weekly and Quarterly Reports

25) Refer to Comment 10 above.

Section B.5.1.2, Field Equipment

26) Inadequate quality control requirements are specified for the XRF analyses. Expand the documentation to note that calibration checks and target element response checks should be conducted twice daily, prior to and upon completion of analysis of field samples. In addition, target analytes, target concentrations, and acceptability criteria should be specified for each of the above-referenced quality control (QC) checks.

27) The laboratory data validation requirements should be expanded to require that at least 10 percent of the confirmation sample data from each of the sites be validated by a party independent of the laboratory in accordance with the National Functional Guidelines for Organic/Inorganic Data Review to ensure adequacy of the data to verify attainment of remedial action objectives.

28) The test methods listed in this table for use during the CMI field effort should be updated to reflect the most current version of SW-846 preparation and analysis methods (e.g.,

SW3050B, SW3550B, SW3010A, SW8260B). For assistance in identifying current methods, please refer to EPAÆs SW-846 online reference manual at www.epa.gov/epaoswer/hazwaste/test/main.htm. If an older or alternate method has been specifically selected for this investigation, the text should provide clear justification for that decision.

Table 2, List of Laboratory Data Quality Assurance Objectives

29) This table should be expanded to specify the required Illinois Environmental Protection Agency (IEPA) practical quantitation limits (PQLs) that are referenced as the target reporting limits for the project and ensure that they are less than the cleanup objectives and other comparison criteria that will be used for the project. The table should also specify accuracy criteria for each of the volatile organic compound (VOC) and semivolatile organic compound (SVOC) constituents of concern (COCs) for the project.